

Total Life, Inc.

Privacy Policy

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## ***Introduction***

Total Life, Inc. and its subsidiaries (“Total Life,” “we,” or “us”) owns and operates websites located at [www.totallife.com](http://www.totallife.com). (the “Website”) and / or other applications (collectively, the “Platform”). Your access and use of the Platform, any part thereof, or anything associated therewith, including its content (“Content”), any products or additional services provided through the Platform or otherwise by Total Life, and any affiliated website, software or application owned or operated by Total Life (collectively, including the Platform and the Content, the “Service” or “Services”) are subject to this Privacy Policy unless specifically stated otherwise. This Privacy Policy is part of our Terms of Use, and all capitalized terms not otherwise defined in this Privacy Policy have the same meaning as set forth in the Total Life Terms of Use (“Terms of Use”).

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE THE SERVICES. WHEN YOU USE OUR SERVICES AND PLATFORM YOU ACCEPT AND AGREE TO THIS PRIVACY POLICY.

We are committed to respecting the privacy of users of the Service. We created this Privacy Policy (“Privacy Policy”) to tell you how Total Life collects, uses, and discloses information in order to provide you with the Service.

By creating, registering, or logging into an account through the Service, or otherwise accessing or using the Service, you are acknowledging the most recent version of this Privacy Policy. We will update this Privacy Policy when necessary to reflect material changes in the Service or how we use “personal information,” and as required by applicable law. If we make any changes to our Privacy Policy, we will post the revised Privacy Policy and update the “Last updated” date at the top of the Privacy Policy. If we make material changes to this Privacy Policy, we will provide notice or obtain consent regarding such changes as may be required by law.

If you are using the Service on behalf of someone other than yourself, you represent and warrant that you are legally-authorized by such an individual to act on their behalf, and that such individual acknowledges the practices and policies outlined in this Privacy Policy.

## ***Limitations on Use by Minors***

The Service may only be used by individuals who are at least eighteen (18) years of age or such older age as may be required by applicable state laws in the jurisdiction in which an individual utilizes the Service. The Service is not designed or intended to attract, and is not directed to, children under eighteen (18) years of age. If we obtain actual knowledge that we have collected personal information through the Platform from a person under eighteen (18) years of age, we will use reasonable efforts to refrain from further using such personal information or maintaining it in retrievable form.

## ***Protected Information***

When you set up an account with Total Life, you are creating a direct customer relationship with Total Life that enables you to access and/or utilize the various functions of the Platform and the Service as a user. As part of that relationship, you provide personal information to Total Life, including but not limited to, your name, email address, home or physical address, phone number and certain transactional information, which we do not consider to be “protected health information” or “medical information.”

However, when you use certain components of the Service, you may provide health or medical information that may be protected under applicable laws. Total Life is not a “covered entity” under the Health Insurance Portability and Accountability Act of 1996, Public Law 104-191, and its related regulations and amendments from time to time (collectively, “HIPAA”). However, one or more of the Medical Groups may or may not be a “covered entity” or “business associate” under HIPAA, and Total Life may in some cases be a “business associate” of those Medical Groups. HIPAA does not necessarily apply to an entity or person simply because there is health information involved, and HIPAA may not apply to your transactions or communications with Total Life and the Medical Groups. To the extent Total Life is deemed a “business associate” however, and solely in its role as a business associate, Total Life may be subject to certain provisions of HIPAA with respect to “protected health information” (“PHI”), as defined under HIPAA, that you provide to Total Life, the Medical Groups, or other Providers. In addition, any medical or health information that you provide that is subject to specific protections under applicable state laws (collectively, with PHI, “Protected Information”), will be used and disclosed only in accordance with such applicable laws. However, any information that does not constitute Protected

Information under applicable laws may be used or disclosed in any manner permitted under this Privacy Policy. Protected Information does not include information that has been de-identified in accordance with applicable laws. The Medical Groups and Providers have adopted a Notice of Privacy Practices that describes how they use and disclose Protected Information. By accessing or using any part of the Service, you acknowledge receipt of the Notice of Privacy Practices from the Medical Groups and Providers.

By accessing or using any part of the Service, you understand that any information that you submit to Total Life that is not intended and used solely for the provision of diagnosis and treatment by the Affiliated Medical Groups, is not considered Protected Information, and will be subject only to our Privacy Policy and any applicable state laws that govern the privacy and security of this information. For purposes of clarity, information you provide to Total Life in order to register and set up an account on the Platform, including name, date of birth, username, email address, physical address, and phone number, are not considered Protected Information.

## ***Personal Information We Collect and How We Collect It***

Personal information that we collect depends on how you interact with us, the services that you use, and the choices you make with regards to the Services and your privacy choices.

We collect information about you from different sources and in different ways when you use the Services, including information that you directly provide us, information that we collect automatically, information that we collect from third-party sources, or information that we can infer or develop from other data.

**Information You Directly Provide:** We collect personal information that you directly provide to us when using the Services, filling out forms, requesting Services, or otherwise contacting or sharing information with us. For example:

- **Name and contact information**, such as your name, email address, phone number, and billing and physical addresses.
- **Demographic data**, such as your date of birth, ethnicity, and zip code.
- **Social plug-ins**, such as third-party websites, networks, platforms, servers and/or application information (e.g., Facebook, Twitter, Instagram).
- **Payment information**, such as your payment card number, financial account information, and other payment details.

- **User Content**, such as uploads and posts to the Services like photographs, videos, documents, feedback on the Services, and other files. This includes email messages and other communications you send to us asking for technical support or help.
- **Employment information**, such as content of job applications you submit to us and other information contained within them, including your resume.
- **Sensitive Personal Information**, for example:
  - **Account & log-in information**: Usernames or account numbers, your passwords, additional security questions, or other information that allows you to access your account.
  - **Government IDs**: Including your state or federal issued government IDs, passports, driver's licenses, and social security numbers.
  - **Sensitive demographic data**: This includes information about your racial or ethnic origin
  - **Sex assigned at birth and sexuality**: your sex assigned at birth and gender preferences, orientation, and other components of sexuality
  - **General health data**: such as information about your symptoms, medical history, lifestyle, prescriptions genetics, treatment options, and relevant physical characteristics (e.g., your height and weight) as well as medical photos you upload, lab results, and your health insurance information (including information about your plan sponsor or responsible family member).
  - **Mental Health / Therapy Data**: details about your mental health treatments and drug and alcohol use or dependency; and information you may share with your Provider to facilitate therapy, including journal entries, worksheets, audio messages, session recordings, etc.
  - **Contents of the communications**. Includes other data and information that you share or make available to us when accessing the Services.

**Information we collect automatically.** We collect information when you use our services or visit our Platform automatically, for example:

- **Information and identifiers about your devices.** We log your internet protocol (IP) address and information about your device, operating system browser, and other software including type, version, language, settings, and configuration, including Cookies, Mobile IDs.
- **Geolocation data.** Depending on the services that you use and your device settings, we collect geolocation data when you use the Services such as the general location of your IP address.
- **User behavior and activity.** We automatically log your activity on our Websites, including referring and exit pages and URLs, pages that you viewed, and the order in which you viewed or interacted with the site, such as though your clicks, files

that you download, how long you stayed on a page, the times you accessed the pages, and other actions that describe your use of the website and services. In some cases, this data may be considered sensitive personal information if it is obtained in relation to browsing activity on health-related pages for specific services, for instance if you visit a specific therapy or treatment option page, it may be considered sensitive personal information. For more information refer to our Cookies Policy below.

**Information that we obtain from third party sources.** Sometimes, we collect the types of information we described above from third parties we work or do business with. These sources can include, but are not limited to:

- **Publicly available sources.** Public sources of information such as open government databases.
- **Third-party apps and partners.** Third-party applications and services, including social media networks such as when you “like” or “comment” our social media pages, log-in through third party applications and integrations, or choose to connect or share with us with data from third party platforms like fitness trackers, sleep monitors, other wearable devices, and their associated data.
- **Service providers.** Third parties that collect or provide data in connection with work they do on our behalf, for example companies that determine your device’s location based on its IP address.
- **Co-branding/marketing affiliates.** Affiliates with which we offer co-branded advertisements or services or whom we engage in joint marketing activities to promote our services.

**Information that we develop or infer.** We may develop or create inferences using information about you from the data we collect. Developing these inferences includes using automated means to infer information about your likely preferences or other characteristics (“inferences.”)

You may decline to provide us certain data and other personal information, or to use certain web browser or operating system controls to prevent our automatic data collection. However, if you choose not to provide or allow us to collect the information necessary to access or use certain services or features, then those services or features may not be fully functional or available for you.

Total Life provides business support services to the medical providers and certain pharmacies you may access through the Services. As a result, we may store additional health information on their behalf, including your medical record, communications with providers, therapy and other psychiatry notes, your medical history, and prescription information.

## ***Cookies, Web Beacons, and Other Similar Online Tracking Technology***

Cookies are small text files placed by a website and stored by your browser on your device. When you visit the same website again, your browser can send the cookie back to the website's server. Cookies contain a unique set of numbers and letters that can identify your device and store other information about you. This helps websites recognize your browser over time.

Web beacons are tiny electronic images with unique identifiers (also called single-pixel or clear GIFs) that are contained within a website or email. When your browser opens a webpage or email that contains a web beacon, it automatically connects to the web server that hosts the image (typically operated by a third party). This allows that web server to log information about your device and to set and read its own cookies. In the same way, third-party content on our websites (such as embedded videos, plug-ins, or ads) results in your browser connecting to the third-party web server that hosts that content. Just some of the way we use web beacons is to collect information like clicks, ad impressions, and email or newsletter open rates, or to access user's cookies.

### **How we and our advertising partners use cookies and online tracking technologies**

We, and our analytics and advertising partners, use these technologies in our websites, platform and online services to collect personal information (such as the pages you visit, the links you click on, and similar usage information, identifiers, and device information) when you use our services, including personal information about your online activities over time and across different websites or online services. This data is used to store your preferences and settings, enable you to sign-in, analyze how our websites and apps perform, track your interaction with the site or app, develop or create inferences, serve you interest-based advertising, combat fraud, and fulfill other legitimate purposes. We and/or our partners also share the data we collect or infer with third parties for these purposes. For more information about the third-party analytics and advertising partners that collect personal information on our services, please see the "Disclosure of Personal Information" section of this Privacy Policy.

## Choices about Cookies and tracking controls

There are a range of cookie and related controls available through browsers, mobile operating systems, and elsewhere. See the “Choice and Control of Personal Information” section below for details about your technology choices.

## ***Use of Personal Information***

We use the personal information we collect for purposes described in this Privacy Policy or as otherwise disclosed by you, subject to the limitations addressed in the “Protected Information” section above. For example, we use personal information for the following purposes:

Purpose of Use	Categories of Personal Information	Categories of Sensitive Information
<b>Product and service delivery.</b> To provide, manage, and deliver the Services, including troubleshooting, facilitating your use of the Services, confirming your location, improving, and personalizing those services.	Contact information, demographic data, payment information, user content, identifiers and device information, geolocation data, usage data, inferences	Government ID, account and log-in information, sensitive demographic data, contents of communications, for identification, general health data, mental health and therapy data, information on your sex assigned at birth and sexuality
<b>Business operations.</b> To operate our business, such as billing, processing your payments, accounting, administering your account, improving our internal operations, securing our systems, detecting fraudulent or illegal activity, verifying your identity, and meeting our legal obligations. Additionally, to protect or enforce our rights and properties.	Contact information, demographic data, payment information, user content, identifiers and device information geolocation data, usage data, inferences	Government ID, account and log-in information, sensitive demographic data, contents of communications, for identification, general health data, mental health and therapy data, information on your sex assigned at birth and sexuality
<b>Healthcare operations.</b> To provide support to our affiliated medical groups and their providers,	Contact information, demographic data, payment information, user content, identifiers	Government ID, account and log-in information, sensitive demographic

<p>to assist with patient intake, eligibility to participate in the services, including insurance checks and coordination, business support services to allow the medical groups to run their practices, and other necessary information,</p>	<p>and device information geolocation data, usage data, inferences</p>	<p>data, contents of communications, session recordings, for identification, general health data, mental health and therapy data, information on your sex assigned at birth and sexuality</p>
<p><b>Product improvement, development, quality review, and research.</b> To develop, test, or improve the Services and content, features and/or products or services offered via the Service, to identify or create new products or services, or to analyze traffic and user behavior or activity to and through Service.</p>	<p>Contact information, demographic data, payment information, user content, identifiers and device information, geolocation data, usage data, inferences</p>	<p>Government ID, account and log-in information, sensitive demographic data, session recordings, contents of communications, for identification, general health data, mental health and therapy data, information on your sex assigned at birth and sexuality</p>
<p><b>Personalization.</b> To understand you and your preferences to enhance your experience and enjoyment using our services.</p>	<p>Contact information, demographic data, payment information, user content, identifiers and device information geolocation data, usage data, inferences</p>	<p>Government ID, account and log-in information, sensitive demographic data, contents of communications, for identification, general health data,mental health and therapy data, information on your sex assigned at birth and sexuality</p>
<p><b>Customer support.</b> To provide customer support, fulfill your requests, and respond to your questions. Additionally, to place and track orders for products or services on your behalf, and to assist you in connecting with healthcare providers.</p>	<p>Contact information, demographic data, payment information, user content, identifiers and device information geolocation data, usage data, inferences</p>	<p>Government ID, account and log-in information, sensitive demographic data, contents of communications, for identification, general health data, mental health and therapy data, information on your sex assigned at birth and sexuality</p>
<p><b>Communications.</b> To send you information about us or our affiliated entities, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages. Additionally, to communicate with you by letter, email, text,</p>	<p>Contact information, demographic data, payment information, user content, identifiers and device information geolocation data, usage data, inferences</p>	<p>Government ID, account and log-in information, sensitive demographic data, contents of communications, for identification, general health data, information on your sex assigned at birth and sexuality</p>

telephone, or other forms of communication, including on behalf of your Provider(s), to facilitate therapy and other telehealth Service.		
<b>Marketing.</b> To communicate with you about new services, offers, promotions, rewards, contests, upcoming events, and other information about our services and those of our selected partners.	Contact information, demographic data, payment information, user content, identifiers and device information geolocation data, usage data, sensor data, inferences	General health data, information on your sex assigned at birth and sexuality
<b>Advertising.</b> To promote and market our and our Affiliated Entities' Service, and the products and/or services offered via the Service.	Contact information, demographic data, identifiers and device information, geolocation data, usage data, inferences.	General health data, information on your sex assigned at birth and sexuality

We use different combinations of the data that we collect from different places for the purposes above to provide you with our most effective and personalized experience.

We may also use details about your browsing and activity on the Service to promote and market Total Life and the products or services offered. This helps us evaluate the effectiveness of our marketing and advertisement efforts. Sometimes, your activity may include information about visits to health-related pages on the Service. In certain states, we may need your consent before using information that may be considered your sensitive personal information. Although, we may use your website activity from our health-related pages, we do not use Protected Information for advertising or marketing.

Moreover, we may aggregate and/or de-identify your information in ways that it may no longer be associated or linked to you or your devices. We can then develop, create, and sell the aggregated and/or de-identified data for any business purpose not prohibited by applicable law, including research or marketing, and may disclose this information to third-parties, including advertisers, promotional partners, and sponsors.

## Use of Artificial Intelligence

We use Artificial Intelligence (“AI”) technologies to process information that we collect about you, including information that you share with the Medical Group providers, as detailed throughout this Privacy Policy. Our use of the information we collect may include some automated and some human (or manual) methods of processing. The automated processing typically includes features aimed at

completing manual, repetitive tasks more efficiently. Some of these tasks may include contacting you for appointment reminders or follow ups, enhancing your engagement with the platform, and care coordination, however, at no time should you consider Total Life's AI related features and content to be considered medical advice. We also use AI to personalize content or recommendations, improve the quality, efficiency and accuracy of the Services; enhance customer support, billing and payment notifications, our sign up process, and other Service requests through AI-assisted responses.

We also use AI to help therapists and healthcare providers manage and document their interactions with you more effectively. AI is never solely used to make medical decisions or provide healthcare and therapy directly to you. Use of AI technologies does not replace the professional judgment of licensed healthcare providers and therapists, who remain fully responsible for all clinical decisions.

All data processed by AI tools is integrated into the Services in accordance with applicable laws, including the Health Insurance Portability and Accountability Act (HIPAA) and other data protection laws, clinical guidelines, and ethical practice standards. Importantly, your PHI and other sensitive data collected and used within our AI systems is not shared with any third party for their use or improvement of their products and services. Our AI tools used in the Services operate within secure, controlled environments and are designed to respect patient confidentiality and data security. We do use your de-identified information to train and improve Total Life's AI models, we may also use stored recordings, transcripts, and other information about you, including your health information, notes about your therapy sessions, or any other information that you have shared with your provider to develop our AI technologies. **IF YOU DO NOT CONSENT TO OUR USE OF AI THEN YOUR SOLE AND EXCLUSIVE REMEDY IS TO NOT USE THE SERVICES.**

**BY USING THE SERVICES, YOU EXPRESSLY ACKNOWLEDGE AND CONSENT TO OUR USE OF AI TECHNOLOGIES AS DESCRIBED HEREIN, INCLUDING THE PROCESSING OF YOUR DATA IN ACCORDANCE WITH APPLICABLE PRIVACY LAWS AND THE TERMS SET FORTH IN THIS AGREEMENT. IF YOU DO NOT WISH TO HAVE YOUR INFORMATION BE PART OF OUR AI TECHNOLOGIES, YOUR SOLE AND EXCLUSIVE REMEDY IS TO NOT USE THE SERVICE.**

## ***Disclosure of Personal Information***

**Subsidiaries and Affiliated Entities.** We may disclose personal information to our subsidiaries and Affiliated Entities, which include healthcare providers and therapists, to allow us to provide the Services and for the Medical Groups to provide you with therapy and other healthcare services and to collect your payment on their behalf. Any information relating to you that we provide to our

subsidiaries or Affiliated Entities will be treated by them in accordance with the terms of this Privacy Policy and, when applicable, our Affiliated Entities' Notice of Privacy Practices.

**Service Providers.** We may use independent contractors, vendors, and suppliers to provide specific services and products related to our Platform, or products, such as providing payment processing, fraud screening, implementation of AI technologies, and IT hosting and security, development, and support.

**Financial services & payment processing.** When you make a purchase, we share your payment details and other personal information with banks and other financial institutions to process payments, prevent fraud, and manage other financial services, to the extent that this personal information is not considered Protected Information, and subject to additional standards through HIPAA.

**Marketing and Advertising Partners.** We may provide personal information, including information obtained through cookies, to marketing and advertising partners. For example, we may disclose identifying information to an advertising partner in order to deliver personalized advertising to you or for the purpose of delivering advertisements to other people with similar interests to you. Consistent with your choices, this may include certain sensitive personal information such as general health data or information about your mental health to the extent it is not Protected Information, in order to deliver you advertisements that we and/or these partners believe to be relevant to you.

**Laws, Law Enforcement, and Legal Rights.** We may share your personal information if we are legally required to do so, such as complying with a law, court order, or any other valid legal process, subject to any additional protections afforded to Protected Information. We may also share personal information in special cases, like if we need to take action against someone violating the law, or our Terms of Use, other policies or and user agreements and to enforce our rights under these agreements. Additionally, we may disclose information if we believe it's necessary to protect the safety of our users, our website, or the public.

**Sale or Business Transaction.** We may disclose personal information to third parties in connection with a change to the control or financial status of the company, including a corporate restructuring, sale, acquisition, financing, reorganization, bankruptcy, receivership, transfer, or assignment of assets or business merger or divestiture.

**Third Party Analytics and Advertising.** We may also use third-party web analytics and advertising service vendors, on our Services to collect and analyze your personal information through cookies and similar tools; engage in auditing, research, or reporting; assist

with fraud prevention; try to locate or combine information on the same unique users across multiple browsers or devices to better tailor services and features to them. These service vendors may also use this information to improve their analytics for their own purpose and for others. To learn how to update your choices with our third-party analytics and advertising partners, click [here](#).

Furthermore, some of our services also include integrations, references, or links to services provided by third parties whose privacy practices differ from ours. If you provide personal information to any of those third parties, or allow us to share personal information with them, that information is governed by their privacy statements.

Finally, we may disclose aggregated and/or de-identified information in accordance with applicable law.

## ***Privacy Choices & Controls***

We value your choices and provide for you a variety of ways for you to control what personal information we store about you and choices about how we use that data. We provide a variety of ways for you to control the personal information we hold about you, including choices about how we use that data. In certain jurisdictions, your choices and controls may be recognized as rights protected and enforced through applicable laws.

**Request access, portability, correction, and deletion.** If you wish to request further access, download, copy, request correction, or delete your personal information that we hold, please email [privacy@totallife.com](mailto:privacy@totallife.com) to make your request. Please note that this section applies to personal information only, and for any other request of your Protected Information, please reference the Notice of Privacy Practices. You can send us a request by using our contact information included at the bottom of this Privacy Policy.

Certain information may be exempt from your requests under applicable law, such as when fulfilling the request would prevent us from completing a transaction, interfere with legal obligations, affect legal matters like account data rights, or involve disproportionate cost or effort. We will respond to your requests in a reasonable timeframe and explain any denials if they occur. If we deny your request, certain laws may grant you appeal rights and we will do our best to inform you of these applicable appeal options.

We will not penalize, discriminate, or retaliate against anyone that makes a rights request, but in some cases we will not be able to provide our Services to you without that information.

**Opt out of sale of and disclosure of information for online personalized advertising.** As explained in the Third Party Analytics and Advertising section above, and subject to applicable laws as discussed further below, we may allow third parties to receive certain information such as cookies, IP address, device identifiers, contact information, browsing behavior, and/or other activity to enable the delivery of personalized advertising to you. These activities may qualify as the "sale" of personal information or "sharing" or processing of personal information for personalized advertising, as defined in applicable law.

If you are a resident of certain states, you may choose to opt out of the sale, sharing, and/or processing of your personal information through cookies, web beacons, and similar online tools for **personalized advertising**. You may opt out by clicking on the "Your Privacy Choices" link on our Website. Moreover, our Website recognizes certain browser-based opt out preferences and signals turned on via your browsers settings (e.g. Global Privacy Control) to the extent required by applicable laws.

In addition to advertising activities using cookies and web beacons, we may also share user email addresses with advertising partners to provide you with more relevant advertising. To opt out of this activity, please <EMAIL OR DESCRIBE THE PROCESS>

If you opt out, you may still receive advertising, it just may not be personalized to your interests. Please note, if you use different browsers, devices, or services you will need to opt out on each browser or device where you want your choice to apply.

If you are interested in more information about personalized browser advertising and how you can generally control cookies from being put on your computer to deliver personalized advertising, you may visit the [Network Advertising Initiative's Consumer opt out link](#), the [Digital Advertising Alliance's Consumer opt out link](#), or [Your Online Choices](#) to opt out of receiving personalized advertising from companies that participate in those programs. We do not control the opt out links, their availability, or whether companies participate in opt out programs. We are not responsible for your choices using these mechanisms or their accuracy. For other opt out options, see the "Browser or Platform Controls" section below. Note that opting out may still result in ads being shown, but they won't be personalized based on your online behavior.

#### **Sensitive Data Opt Out/Opt-In Right.**

**NOTE: THAT THIS SECTION APPLIES TO SENSITIVE PERSONAL INFORMATION COLLECTED THROUGH YOUR USE OF THE WEBSITES ONLY, AND DOES NOT APPLY TO OUR USE OF ANY PROTECTED INFORMATION AS DESCRIBED IN THE NOTICE OF PRIVACY PRACTICES OR IN THE AFOREMENTIONED "PROTECTED INFORMATION" SECTION OF THIS POLICY.**

To deliver more relevant online advertising for our products and services, as described above, we may process and use information that is considered "sensitive data" or "sensitive personal information" under applicable laws, such as your general health data, mental health data, information about sex life and sexual orientation, or your browsing history on our site, including inferences we may make (collectively referred to herein as "sensitive data"). You have a right to limit our use of sensitive data for purposes other than to provide the services or goods you request or as otherwise permitted by law, including our and our partner's processing of sensitive data for personalized advertising purposes. To opt out from such additional purposes, please visit the "Your Privacy Choices" page or use the Global Privacy Control described below. Depending on your jurisdiction, we may ask for your consent before using your sensitive data. If you consent and subsequently change your mind, you can opt out through the "Your Privacy Choices" link at the bottom of our pages. For more information about our use and disclosure of sensitive data, see the "Disclosure of Personal Information" section above.

**Marketing preferences.** You can opt out of receiving communications about products, services, promotions, and events by email, postal mail, or phone by contacting us using the details below. In commercial emails, you can also opt out by following the instructions at the bottom. Please note that, even if you opt out, we may still use and disclose certain information as outlined in this Privacy Policy or as required by law. For example, you cannot opt out of operational emails related to our relationship or transactions with you.

## ***Browser or Platform Controls***

**Cookie controls.** Most web browsers are set to accept cookies by default. If you prefer, you can go to your browser settings to learn how to delete or reject cookies. If you choose to delete or reject cookies, this could affect certain features or services of our Platform. If you choose to delete cookies, settings and preferences controlled by those cookies, including advertising preferences, may be deleted and may need to be recreated.

**Global Privacy Control.** Some browsers and browser extensions support the "Global Privacy Control" (GPC) or similar controls that can send a signal to the websites you visit indicating your choice to opt out from certain types of data processing, including data sales and/or personalized advertising, as specified by applicable law. When we detect such a signal, we will make reasonable efforts to respect your choices indicated by a GPC setting or similar control that is recognized by regulation or otherwise widely acknowledged as a valid opt out preference signal.

**Do Not Track.** Some browsers include a “Do Not Track” (DNT) setting that can send a signal to the websites you visit indicating you do not wish to be tracked. Unlike the GPC described above, there is not a common understanding of how to interpret the DNT signal; therefore, our websites do not respond to browser DNT signals. Instead, you can use the range of other tools to control data collection and use, including the GPC, cookie controls, and advertising controls described above.

**Mobile advertising ID controls.** iOS and Android operating systems provide options to limit tracking and/or reset the advertising IDs.

**Email web beacons.** Most email clients have settings that allow you to prevent the automatic downloading of images, including web beacons, which prevents the automatic connection to the web servers that host those images.

Unless using any available automated controls, we may, at times, decline your requests to exercise these rights to the extent permitted by law. For example, we may refuse requests if fulfilling them would violate the law, harm another person's privacy rights, reveal confidential information, or conflict with legal or business obligations. We may also decline requests if we cannot verify your identity, if the request is excessive, or where otherwise permitted by law. If your request is declined, you may appeal our decision by contacting us as described at the bottom of this Privacy Policy.

Finally, please note that these controls apply only to your “personal information,” which is separate from “medical information” or “protected health information.” To understand our information practices and your rights with respect to such information, visit the Medical Groups Notice of Privacy Practices.

## ***Data Retention***

We retain personal information only as long as necessary to provide services, fulfill your transactions and requests for Services, comply with legal obligations, resolve disputes, enforce agreements, and for other lawful and legitimate business purposes. Our data retention periods may vary based on factors like data type, user consent, information sensitivity, availability of options for deletion, and our legal or contractual obligations

## **Privacy Information for California Residents**

If you are a California resident and the processing of personal information about you is subject to the California Consumer Privacy Act (CCPA), you have certain rights with respect to that information.

**Notice at Collection.** At or before the time of collection, you have a right to receive notice of our privacy practices, including the categories of personal and sensitive personal information collected, purposes for which your information is collected or used, whether the information is sold or shared, and how long the information is retained. This information is provided within this Privacy Policy and clicking the above links will direct you to their specific sections.

**Right to Know.** You have a right to request that we disclose to you the personal information we have collected about you, and how it has been used, disclosed, or sold. Information about how we use, disclose, and the information which might constitute a “sale” is available in this Privacy Policy, but you may also make a “request to know” or access by contacting us at [privacy@totallife.com](mailto:privacy@totallife.com). Please note, that if making this request, we may require you to provide us with additional information in order to verify your identity.

**Rights to Request a Correction or Deletion.** You also have rights to request that we correct inaccurate personal information and that we delete personal information under certain circumstances, subject to a number of exceptions, including how we use and maintain Protected Information subject to HIPAA. To make a request to correct or delete, email us at [privacy@totallife.com](mailto:privacy@totallife.com).

**Right to Opt Out / Do Not Sell or Share My Personal Information.** You have a right to opt out from future “sales” or “sharing” of personal information as those terms are defined by the CCPA. We do not knowingly collect, sell or share the personal information of minors under 18 years of age.

Note that the CCPA defines “sell,” “share,” and “personal information” very broadly, and some of our data sharing described in this Privacy Policy may be considered a “sale” or “sharing” under those definitions. In particular, we allow advertising and analytics providers to collect your identifiers (IP addresses, cookie IDs, and mobile IDs), activity data (browsing, clicks, non-product identifying transaction data), device data, and geolocation data through our sites and when you use our services. We do not “sell” or “share” any other types of personal information (see Disclosure of Personal Information for additional details).

If you don't want us or our partners to "sell" or "share" your personal information for advertising, you can use a Global Privacy Control to opt out. We will respect your choice and not share your data in ways defined as "sale" or "sharing" under the CCPA. However, we

may still share some personal information with service providers to help us perform our certain advertising functions. Additionally, opting out won't affect previously "sold" or "shared" data or stop all interest-based advertising.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** You have a right to limit our use of sensitive personal information for any purposes other than to provide the products or services (including healthcare and wellness services that you request through our Platform) or as otherwise permitted by law.

To opt out from such additional purposes, please visit "Your Privacy Choices" on the bottom of our webpage or use the Global Privacy Control described in the "Privacy Choice and Control" section of this Privacy Policy.

**Authorized Agent.** You can appoint an authorized agent, either in writing or through a power of attorney, to submit your requests or exercise your rights under the CCPA. Before we accept a request from your agent, we'll need proof that you have authorized them to act for you, and we may ask you to verify your identity directly with us.

Further, to provide, correct, or delete specific pieces of personal information we will need to verify your identity to the degree of certainty required by law. We will verify your request by asking you to send it from the email address associated with your account or requiring you to provide information necessary to verify your account.

We will not discriminate against anyone exercising these CCPA rights.

Additionally, under California Civil Code section 1798.83, also known as the "Shine the Light" law, gives residents of California the right under certain circumstances to request information from us regarding the manner in which we disclose certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not disclose your personal information to third parties for their own direct marketing purposes.

## ***Additional Privacy Considerations***

**Securing Accounts & Password Information.** We take actions to implement appropriate physical, technical, and administrative safeguards to protect information from unauthorized access, use, disclosure, alteration, or destruction. However, it is your responsibility to maintain the confidentiality of your account information and password, and for any and all use or access of your account. You must use a strong, unique password for your account and never share it with others. If you suspect your account's security has been compromised, please contact us promptly as outlined in the "Contacting Us" section below.

When using the Service, you may choose not to provide us with certain information, but this may limit the features you are able to use or may prevent you from using the Service all together. You may also choose to opt out of receiving certain communications (e.g., newsletters, promotions) by emailing us your preference. Please note that even if you opt out, we may still send you Service-related communications.

**Linked Sites.** The Site may contain links to third party owned or operated websites, including, without limitation, social media websites (each a “Linked Site”), as a convenient method of accessing information that may be useful or of interest to you. This Policy and the practices that we follow under this Policy do not apply to Linked Sites. We are not responsible for the content, accuracy, or opinions expressed on any Linked Site or for the privacy practices or security standards used by third parties on such Linked Sites. These Linked Sites have separate privacy and data collection practices, and we have no responsibility or liability relating to them. Accordingly, if you use Linked Sites through our Site, to login to our Site, or to share information about your experience on our Site with others, these Linked Sites may be able to collect information about you, including information about your activity on our Site. In accordance with their own privacy policies, the Linked Sites may further notify your social media connections about your use of our Site. You understand and agree that by clicking on a link to a Linked Site or using a Linked Site as described above, this Policy, as stated on the Site, is no longer in effect because you have either left our Site or used a Linked Site to interact with our Site.

## ***Revisions to Our Privacy Policy***

We may update this Privacy Policy to reflect changes in law, our data practices, Services, or technology. The revised policy will be available through the Services, and you should review it periodically. The last revision date is at the top of the document. You are responsible for monitoring updates. If significant changes are made, we will notify you as required by applicable law. Your continued use of our Websites or Services after changes (and notice, if applicable) signifies your acknowledgment of Privacy Policy updates.

## ***Contact Us***

If you have any questions or comments about this Privacy Policy, please contact us by email at:

[Privacy@totallife.com](mailto:Privacy@totallife.com), or by regular mail at:

Total Life Inc.  
Attn: Privacy Officer  
110 Front Street, suite 300, Jupiter Florida 33477

