

## **LIFESPAN COLLABORATIVE SERVICES, LLC'S PRIVACY POLICY**

Effective Date: October 1, 2023

BY VISITING [www.lifespancollaborativeservices.com](http://www.lifespancollaborativeservices.com), YOU ARE LIFESPAN COLLABORATIVE SERVICES, LLC'S PRIVACY POLICY.

Protecting your private information is our priority. LIFESPAN COLLABORATIVE SERVICES, LLC's privacy policy (the "Privacy Policy") is to make you aware of our policies and procedures regarding the collection and safeguard of data provided by you to us as you use or engage with the Site and our Services.

For the purposes of this Agreement, the terms "we," "us," and "our" refer to LIFESPAN COLLABORATIVE SERVICES, LLC (the "Company"). The [www.lifespancollaborativeservices.com](http://www.lifespancollaborativeservices.com) website hereafter is referred to as the "Site." The terms "user," "you," and "your" refer to site visitors, customers, and any and all other users of the Site.

This Privacy Policy applies to the Site, Company's mobile applications, Company's other websites, Company's emails, texts, or other electronic correspondence between you and the Company. This Privacy Policy governs any and all data submissions by user and Company's data collection, maintenance, protection, usage, and disclosure for all of our Services that are available on or through the Site, and other users' websites that use the Services, while you are logged into your account with us or using the Site. For the purposes of this Privacy Policy, unless otherwise noted, all references to the Company include [www.lifespancollaborativeservices.com](http://www.lifespancollaborativeservices.com). By using the Site, you consent to the data practices described in this statement.

Read this policy carefully to understand our use, policies, practices, and treatment of your Personal Information and Non-Personal Information. If you do not wish to agree to the terms and conditions of this Site and this Privacy Policy, you must not access or use this Site.

### **Coverage of the Policy**

We provide services to optimize one's quality of life through therapy interventions, medication management, counseling and coaching (the "Services"). The Services include but are not limited to, therapy, coaching, classes and events and medication management and anything else provided by the Company and its subsidiaries, partners, and affiliates.

### **Children**

The Company does not permit children under the age of 18 ("child") to create an account and does not knowingly collect personally identifiable information from child without the consent and direction of the child's parent or guardian (the "Parent"). Company permits the Parent to set up a child profile that is associated with the Services so that child(s) may access the Services under the Parent's supervision. Company represents and warrants that it takes precautionary measures to collect information only as reasonably necessary for the child to use the Services, ensure Parents maintain access to and control of their child's use of the Services and to safeguard all information collected by Company.

Child information you provide to Company during the Services account set-up is information authorized by you about the child through the Parent's account, which may include a profile name, profile avatar and the age of the child. The Parent should take reasonable cautionary steps to ensure that their child's name and identifying characteristics are protected and imperceptible. Company uses this information to provide the Services to the child. Company uses the email address provided by the Parent to communicate

messages about the account, which includes but is not limited to, subscription notices, reports of the child's progress and password reset information.

Any questions regarding this paragraph, please contact us at [dilicerobertson@lifespanceollaborativeservices.com](mailto:dilicerobertson@lifespanceollaborativeservices.com).

### **Collection of Personal Information**

In order to better provide you with the Services offered, the Company may collect "Non-Personal Information" and "Personal Information." **Non-Personal Information** includes but is not limited to, information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. **Personal Information** includes but is not limited to, your email address, full name, mailing address, billing address, phone number, and credit card information, which you submit to us through the registration or purchase process at the Site. If you purchase our Services, we collect billing and credit card information. This information is used to complete the purchase transaction.

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use our Services. These may include but are not limited to: (a) registering for an account; (b) sending us an email message; (c) submitting your credit card or other payment information when ordering and purchasing our Services. We will use your information for, but not limited to, communicating with you in relation to the Services you have requested from us. We also may gather additional Personal or Non-personal Information in the future.

### **Automatically Collected Information**

Information about your computer hardware and software may be automatically collected by Company. This information can include: your IP address, browser type, domain names, access times, and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Site.

### **Tracking User Behavior**

Company may keep track of the Site and pages our users visit within Company, in order to determine what Services are the most popular. This data is used to deliver customized content and advertising within Company to customers whose behavior indicates that they are interested in a particular subject area.

### **Use of Cookies and Pixels**

The Site may use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Site pages, or register for our Services, a cookie helps the Company recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the Site, the information you previously provided can be retrieved, so you can easily use the Site's features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Services or Site.

This Site may use technological equivalents of cookies, including but not limited to, social media pixels. The use technological equivalents of cookies allow for the tracking of social media users' visit to the Site which will allow Company to customize advertisements the visitor will see while viewing the respective social media site. Company reserves its right to use these technological equivalents of cookies so long as the company complies with the policies of the respective social media site.

### **Links**

The Site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

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

The Company collects and uses your Personal Information to present and make available the Site and its contents to you, operate and deliver the Services you have requested, provide you with information related to the Company's offers for products, subscriptions, and services, execute any contract between you and the Company, and administer all of Company's other legal business activities.

### **Sharing Information with Third Parties**

Company does not sell, rent, trade, lease or otherwise share Personal Information to third parties without your consent. **Please note SMS consent or phone numbers for the purpose of SMS are not shared.**

Company may share data with its affiliates, subsidiaries, successors in interest, or trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these Services to Company, and they are required to maintain the confidentiality of your Personal Information. Your Personal Information will generally be used to contact you.

Company may disclose your Personal Information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) comply with a federal, state, or local statute or comply with legal process served on Company or the Site; (b) protect and defend the rights or property of Company; and/or (c) act under exigent circumstances to protect the personal safety of users of Company or the public.

In general, we use Non-Personal Information to help us improve our Services and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

In the event we undergo a business transaction such as a merger or acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes to the Site so that you may opt out of the new information practices. We suggest that you check the Site periodically if you are concerned about how your information is used.

### **Security of your Personal Information**

Company employs commercially reasonable efforts to secure your personal information from unauthorized access, use, or disclosure. Company strives to implement adequate security measures to

protect against unauthorized access, use, alteration, and disclosure of your Personal Information. All information provided by you is stored in an electronic health record called Practice Fusion where client data is stored. Furthermore, your payment transactions will be encrypted and safely transmitted using commercially reasonable efforts.

Unfortunately, no data transmission over the internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge and agree that: (a) there are security and privacy limitations inherent to the internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through the Site cannot be guaranteed.

#### **California Civil Code Section 1798.83**

Site users that are residents of California are entitled to request certain information related to third-party Personal Information disclosed by us for their direct marketing purposes. If you are a resident of California and wish to make such request, please email us at [dilicerobertson@lifespancecollaborativeservices.com](mailto:dilicerobertson@lifespancecollaborativeservices.com).

#### **Right to Deletion**

Subject to certain exceptions set forth below, on receipt of a verifiable request from you, we will delete your personal information from our records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and the Company;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Company;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

#### **E-mail Communications**

Company may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. In order to improve our Services, we may receive a notification when you open an email from Company or click on a link therein.

From time to time, you may elect to correspond with the Company through email. If you do so, we reserve the right to retain the email and its contents along with your address and our responses.

If you would like to stop receiving informational, marketing, or promotional communications via email from Company, you may opt out of such communications by clicking the unsubscribe link. Notwithstanding the promotional preferences you indicate by unsubscribing, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy.

### **Intellectual Property Rights**

The information contained on the Site, including but not limited to, digital paper designs, templates, blog posts, illustrations, infographics, photographs, videos, logos, opinion-based content, guides, tutorials, text, and any other forms of artistic expression (collectively known as “Intellectual Property”) are the sole property of Company. There shall be no unauthorized use of Company’s Intellectual Property. Company’s Intellectual Property is subject, but not limited to, The Lanham Act (also known as the Trademark Act of 1946), The Copyright Act of 1976, and intellectual property common law.

Company’s Intellectual Property cannot be used without the express written consent of the Company.

Please contact [dilicerobertson@lifespanceollaborativeservices.com](mailto:dilicerobertson@lifespanceollaborativeservices.com) if you seek a license to use the Company.

### **External Data Storage Sites**

We may store your data on servers provided by third party hosting vendors with whom we have contracted.

### **Changes to this Policy**

Company reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on the Site, and/or by updating any privacy information. Your continued use of the Site or Services available after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by our new Privacy Policy.

### **Testimonials**

Company may display personal testimonials of yours on our Site, social media platforms, or marketing materials or presentations, from time to time received by you through the Site, email communication, or other communication methods. If you would not like your testimonial displayed, please contact us at [dilicerobertson@lifespanceollaborativeservices.com](mailto:dilicerobertson@lifespanceollaborativeservices.com), and we will remove your testimony.

Any testimonials on the Site are opinions of the individuals writing them and do not guarantee any future result or success of any individuals using this Site or the Services. Individual results may vary as testimonials are grammatically edited expressions of the experience regarding the Services rendered.

### **Governing Laws**

This Privacy Policy shall be governed under the laws of Connecticut, United States without regards to its conflicts of law provisions.

### **Visitors’ GDPR Rights**

Site users that are within the European Union are entitled to certain rights under the General Data Protection Regulation. Those rights include:

We will retain the any information you choose to provide to us until the earlier of: (a) you asking us to delete the information, (b) our decision to cease using our existing data providers, or (c) the Company decides that the value in retaining the data is outweighed by the costs of retaining it.

You have the right to request access to your data that the Company stores and the rights to either rectify or erase your personal data.

You have the right to seek restrictions on the processing of your data.

You have the right to object to the processing of your data and the right to the portability of your data. To the extent that you provided consent to the Company's processing of your personal data, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent.

You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the General Data Protection Regulation.

We require only the information that is reasonably required to enter into a contract with you. We will not require you to provide consent for any unnecessary processing as a condition of entering into a contract with us, this includes but is not limited to, any downloading of a lead magnet, webinar, freebie, or traditional list building method.

#### **Contact Information**

Company welcomes your questions or comments regarding this Privacy Policy. If you believe that Company has not adhered to this Privacy Policy, please contact Company at:

Email Address: [dilicertobertson@lifespanceollaborativeservices.com](mailto:dilicertobertson@lifespanceollaborativeservices.com)

Phone Number: 203-463-4555

Mailing Address: 1 Bradley Road, Suite 304, Woodbridge, CT 06525

To Contact our GDPR Data Protection Officer: Dilice Robertson via email at [dilicertobertson@lifespanceollaborativeservices.com](mailto:dilicertobertson@lifespanceollaborativeservices.com)