

Privacy Policy

Last updated: Jul 15, 2024

Introduction

MyStart Health, LLC ('MyStart Health' 'we,' or 'us') owns and operates websites (the 'Websites') located at www.MyStartHealth.com may have previously, now or in the future own and/or operate a MyStart Health mobile application (collectively, the 'Platform'). Your access and use of the Platform, any part thereof, or anything associated therewith, including its content ('Content'), any products or services provided through the Platform or otherwise by MyStart Health, and any affiliated website, software or application owned or operated by MyStart Health (collectively, including the Platform and the Content, the ('Service') are subject to this Privacy Policy unless specifically stated otherwise. Capitalized terms not otherwise defined in this Privacy Policy have the same meaning as set forth in the MyStart Health Terms and Conditions ('Terms and Conditions').

We are committed to respecting the privacy of users of the Service. We created this Privacy Policy ('Privacy Policy') to tell you how MyStart Health 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. If we make any changes to our Privacy Policy, we will post the revised Privacy Policy and update the 'Last updated' date of the Privacy Policy.

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

Limitations on Use by Minors

Our Service is generally intended for use 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. Individuals who are at the age eighteen (18) (or such older age of majority) may use the Service for the sole purpose of obtaining a medical consultation for the treatment of acne using topical skincare products (to the extent made available) if a parent or legal guardian provides consent to such use in accordance with the requirements set forth in our Terms and Conditions and 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.

Furthermore, if you are under eighteen (18) years of age, then you (or your parent or legal guardian if you are under age 18) may at any time request that we remove content or information about you that is posted on the Platform. Please submit any such request ('Request for Removal of Minor Information') to either of the following:

- By mail:
MyStart Health, LLC
254 Chapman Rd. STE: 209
Newark, DE 19702
with a subject line of 'Removal of Minor Information'. If you send by mail, please send by U.S. Certified Mail, Return Receipt Requested to allow for confirmation of mailing, delivery and tracking.
- By email:
support@MyStartHealth.com , with a subject line of 'Removal of Minor Information'

For each Request for Removal of Minor Information, please state 'Removal of Minor Information' in the email or letter subject line, and clearly state the following in the body of the request:

- The nature of your request
- The identity of the content or information to be removed
- The location of the content or information on the Platform (e.g. by providing the URL)
- That the request is related to the 'Removal of Minor Information'
- Your name, street address, city, state, zip code and email address, and whether you prefer to receive a response to your request by mail or email

We will not accept any Request for Removal of Minor Information via telephone or facsimile. MyStart Health is not responsible for failing to comply with any Request for Removal of Minor Information that is incomplete, incorrectly labeled or incorrectly sent. Please note that we are not required to erase or otherwise eliminate, or 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 MyStart Health to maintain the content or information; when MyStart Health maintains the content or information on behalf of your Providers (as defined in our Terms and Conditions) as part of your electronic medical record; when the content or information is stored on or posted to the Site 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 MyStart Health 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.

The foregoing is a description of MyStart Health' voluntary practices concerning the collection of personal information through the Service from certain minors, and is not intended to be an admission that MyStart Health is subject to the Children's Online Privacy Protection Act, the Federal Trade Commission's Children's Online Privacy Protection Rule(s), or any similar international, federal, state, or local laws, rules, or regulations.

Protected Health Information

When you set up an account with MyStart Health, you are creating a direct customer relationship with MyStart Health 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 information to MyStart Health, including but not limited to, your name, email address, shipping address, phone number and certain transactional information, that we do not consider to be 'protected health information' or 'medical information'.

However, in using certain components of the Service, you may also provide certain health or medical information that may be protected under applicable laws. MyStart Health 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'). One or more of the Labs, Pharmacies or Medical Groups (as defined in our Terms and Conditions) may or may not be a 'covered entity' or 'business associate' under HIPAA, and MyStart Health may in some cases be a 'business associate' of a Pharmacy or Medical Group. It is important to note that 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 MyStart Health, the Medical Groups, the Providers, the Labs, or the Pharmacies.

To the extent MyStart Health is deemed a 'business associate' however, and solely in its role as a business associate, MyStart Health, may be subject to certain provisions of HIPAA with respect to 'protected health information,' as defined under HIPAA, that you provide to MyStart Health, the Medical Group or the Providers ('PHI'). 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 your Medical Group and Provider(s).

By accessing or using any part of the Service, you understand that even if HIPAA does apply to MyStart Health, the Medical Groups, the Providers, the Labs, or the

Pharmacies, any information that you submit to MyStart Health that is not intended and used solely for the provision of diagnosis and treatment by the Medical Group and Providers, laboratory services by the Labs or prescription fulfillment by the Pharmacies, is not considered Protected Information, and will only be subject to our Privacy Policy and any applicable state laws that govern the privacy and security of such information. For purposes of clarity, information you provide to MyStart Health in order to register and set up an account on the Platform, including name, username, email address, shipping address and phone number, are not considered Protected Information.

Collection of Personal Information

The personal data we collect depends on how you interact with us, the services you use, and the choices you make.

We collect information about you from different sources and in various ways when you use our services, including information you provide directly, information collected automatically, information from third-party data sources, and data we infer or generate from other data.

Information you provide directly. We collect personal data you provide to 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 gender, date of birth, and zip code.
- Third-party website, network, platform, server and/or application information (e.g., Facebook, Twitter, Instagram)
- Payment information, such as your credit card number, financial account information, and other payment details.
- Content and files, such as photographs, videos, documents, and other files you upload to our Service. This includes email messages and other communications you send to us.
- Sensitive personal information
 - Government ID. We may collect government-issued identifiers such as driver's license, passport number, and social security numbers.
 - Photographic or video images submitted for identification or non-diagnosis or treatment purposes, including photographs of your driver's license or passport
 - Account access information. We collect information such as a username or account number in combination with a password, security or access code, or other credential that allows access to an account.
 - Sensitive demographic data. We collect information about racial or ethnic origin.
 - Contents of communications. We collect the contents of communications that you make via our Service.

- Biometric information. We or our service providers may use biometric information to verify your identity prior to your use of our Service.
- Health data. We collect and analyze information concerning your health.
- Sexuality. We collect and analyze information about your sex life or sexual orientation.

Information we collect automatically. When you use our services, we collect some information automatically. For example:

- Identifiers and device information. When you visit our websites, our web servers automatically log your Internet Protocol (IP) address and information about your device, including device identifiers (such as MAC address); device type; and your device's operating system, browser, and other software including type, version, language, settings, and configuration. As further described in the "Cookies, Mobile IDs, and Similar Technologies" section below, our websites and online services store and retrieve cookie identifiers, mobile IDs, and other data.
- Geolocation data. Depending on your device and app settings, we collect geolocation data when you use our apps or online services. This information may include precise geolocation data, meaning data derived from a device and that is used to locate you within a circle with a radius of 1,850 feet or less, which is considered a type of sensitive personal information.
- Usage data. We automatically log your activity on our websites, apps and connected products, including the URL of the website from which you came to our sites, pages you viewed, how long you spent on a page, access times, and other details about your use of and actions on our website. In some instances, such usage data may be sensitive personal information if it relates to browsing activity on health-specific sites.

Information we create or generate. We infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics ("inferences"). For example, we infer your general geographic location (such as city, state, and country) based on your IP address.

Information we obtain from third-party sources. We also obtain the types of information described above from third parties. These third-party sources include, for example:

- Third-party partners. Third-party applications and services, including social networks you choose to connect with or interact with through our services.
- Co-branding/marketing partners. Partners with which we offer co-branded services or engage in joint marketing activities.
- 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.
- Publicly available sources. Public sources of information such as open government databases.

When you are asked to provide personal data, you may decline. And you may use web browser or operating system controls to prevent certain types of automatic data collection. But if you choose not to provide or allow information that is necessary for certain services or features, those services or features may not be available or fully functional.

MyStart Health provides management services to the medical providers and certain pharmacies you may access through our Service. As a result, we may store additional health information on their behalf, including your medical record, communications with providers, and medical history.

Cookies, Mobile IDs, and Similar Technologies

We use cookies, web beacons, mobile analytics and advertising IDs, and similar technologies to operate our websites and online services and to help collect data, including usage data, identifiers, and device information.

What are cookies and similar technologies?

Cookies are small text files placed by a website and stored by your browser on your device. A cookie can later be read when your browser connects to a web server in the same domain that placed the cookie. The text in a cookie contains a string of numbers and letters that may uniquely identify your device and can contain other information as well. This allows the web server to recognize your browser over time, each time it connects to that web server.

Web beacons are electronic images (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. We also include web beacons in our email messages or newsletters to tell us if you open and act on them. Mobile analytics and advertising IDs are generated by operating systems for mobile devices (iOS and Android) and can be accessed and used by apps in much the same way that websites access and use cookies. Our apps contain software that enables us and our third-party analytics and advertising partners to access these mobile IDs.

How do we and our partners use cookies and similar technologies?

We, and our analytics and advertising partners, use these technologies in our websites, apps, and online services to collect personal data (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 data 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 inferences, deliver and tailor 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 “Our Disclosure of Personal Data” section of this statement.

What controls are available?

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

Use of Information

We use the personal data we collect for purposes described in this privacy statement or as otherwise disclosed to you, subject to the limitations addressed in the Protected Health Information Section above. For example, we use personal data for the following purposes:

Purpose of Use

Product and service delivery. To provide and deliver our Service, including troubleshooting, facilitating your movement through the Service, confirming your location, improving, and personalizing those services.

Categories of Personal Data

Contact information, demographic data, payment information, content and files, biometric information, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: government ID, account access information, sensitive demographic data, contents of communications, biometric information for identification, health data for collecting and analyzing, information about sex life or sexual orientation for collecting and analyzing.

Business operations. 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 MyStart Health' rights and properties.

Contact information, demographic data, payment information, content and files, biometric information, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: government ID, account access information, precise geolocation data, sensitive demographic data, contents of communications, genetic data, biometric information for identification, health data for collecting and analyzing, information about sex life or sexual orientation for collecting and analyzing.

Product improvement, development, and research. To develop, test, or improve the Service and content, features and/or products or services offered via the Service. Additionally, to Identify or create new products or services. Lastly, to analyze traffic and user behavior or activity to and through Service

Contact information, demographic data, payment information, content and files, biometric information, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: government ID, account access information, precise geolocation data, sensitive demographic data, contents of communications, genetic data, biometric information for identification, health data for collecting and analyzing, information about sex life or sexual orientation for collecting and analyzing

Personalization. To understand you and your preferences to enhance your experience and enjoyment using our services.

Contact information, demographic data, payment information, content and files, biometric information, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: government ID, account access information, precise geolocation data, sensitive demographic data, contents of communications, genetic data, biometric information for identification, health data for collecting and analyzing, information about sex life or sexual orientation for collecting and analyzing.

Customer support. 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

Contact information, demographic data, payment information, content and files, biometric information, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: government ID, account access information, precise geolocation data, sensitive demographic data, contents of communications, genetic data, biometric information for identification, health data for collecting and analyzing, information about sex life or sexual orientation for collecting and analyzing.

Communications. To send you information about MyStart Health, the Labs, the Pharmacies, the Medical Groups, the Providers, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages. Additionally, to communicate with you by letter, email, text, telephone, or other forms of communication, including on behalf of your Provider(s), to facilitate telehealth Service

Contact information, demographic data, payment information, content and files, biometric information, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: government ID, account access information, precise geolocation data, sensitive demographic data, contents of communications, genetic data, biometric information for identification, health data for collecting and analyzing, information about sex life or sexual orientation for collecting and analyzing.

Marketing. 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, content and files, biometric information, identifiers and device information geolocation data, usage data, sensor data, inferences

Sensitive information: health data for collecting and analyzing

Advertising. To promote and market MyStart Health, the Service, and the products and/or services offered via the Service.

Contact information, demographic data, identifiers and device information, geolocation data, usage data, inferences

Sensitive information: health data for collecting and analyzing

Additionally, we may use your browsing and other activity on the Service to promote and market MyStart Health, the Service, and the products and/or services offered via the Service, as well as to measure our advertising and marketing efforts. Depending on your activity on the Service, this may include information related to you visiting health-related pages on the Service. In some states, we may be required to obtain your consent prior to using information that constitutes sensitive personal information. While

we may use information about your browsing activity on health-related pages, we do not use Protected Information for advertising or marketing.

We may de-identify your information and use, create and sell such de-identified information or any business or other purpose not prohibited by applicable law.

Disclosure of Information

We disclose personal data with your consent or as we determine necessary to complete your transactions or provide the services you have requested or authorized. Subject to the limitations described in the Protected Health Information section above, we may disclose your information to third parties in connection with the provision of our Service or as otherwise permitted or required by law. For example, we may disclose your information to:

- Service providers. We provide personal data to vendors or agents working on our behalf for the purposes described in this statement. For example, companies we've hired to provide customer service support or assist in protecting and securing our systems and services may need access to personal data to provide those functions.
- Financial services & payment processing. When you provide payment data, for example to make a purchase, we will disclose payment and transactional data to banks and other entities as necessary for payment processing, fraud prevention, credit risk reduction, analytics, or other related financial services.
- Financial services & payment processing. When you provide payment data, for example to make a purchase, we will disclose payment and transactional data to banks and other entities as necessary for payment processing, fraud prevention, credit risk reduction, analytics, or other related financial services.
- The Labs, Pharmacies, Medical Groups, or their Providers. We facilitate information sharing between you and the Medical Groups, Pharmacies, Providers, and Labs, as applicable, to enable them to provide services to you via the Service and to collect payment on their behalf.
- Corporate transactions. We may disclose personal data as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or a transfer, divestiture, or sale of all or a portion of our business or assets.
- Legal and law enforcement. We will access, disclose, and preserve personal data when we believe that doing so is necessary to comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.
- Security, safety, and protecting rights. We will disclose personal data if we believe it is necessary to:

- protect our customers and others, for example to prevent spam or attempts to commit fraud, or to help prevent the loss of life or serious injury of anyone;
- operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks; or
- protect the rights or property of ourselves or others, including enforcing our agreements, terms, and policies.

Third party analytics and advertising companies also collect personal data through our website and apps including identifiers and device information (such as cookie IDs, device IDs, and IP address), geolocation data, usage data, and inferences based on and associated with that data, as described in the “Cookies” section of this statement. These third-party vendors may combine this data across multiple sites to improve analytics for their own purpose and others. For example, we use Google Analytics on our website to help us understand how users interact with our website; you can learn how Google collects and uses information at www.google.com/policies/privacy/partners. Other third-party analytics and advertising providers we use on our websites include, for example:

Company/Service	Purpose(s)	Privacy Notices	Manage Settings (opt-out)
Google (DoubleClicks)	Advertising, analytics	https://policies.google.com/technologies/partner-sites	https://adssettings.google.com/
Twitter Advertising	Advertising	https://twitter.com/en/privacy	https://help.twitter.com/en/using-twitter/tailored-suggestions#
Facebook Audiences	Advertising	https://www.facebook.com/privacy/explanation	https://www.facebook.com/settings?tab=ads
Google Analytics	Analytics	https://policies.google.com/technologies/partner-sites	https://tools.google.com/dlpage/gaoptout

Some of the data disclosures to these third parties may be considered a “sale” or “sharing” of personal information as defined under the laws of California and other U.S. states. Please see the “Choice and Control” and “California Privacy Rights” sections below for more details.

Please note that 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 data to any of those third parties, or allow us to share personal data with them, that data is governed by their privacy statements.

Finally, we may disclose de-identified information in accordance with applicable law.

Choice and control of personal data

We provide a variety of ways for you to control the personal data we hold about you, including choices about how we use that data. In some jurisdictions, these controls and choices may be enforceable as rights under applicable law.

If you wish to access, copy, download, correct, or delete personal data about you that we hold, please visit MyStartHealth.com/privacy.

You can choose whether to receive promotional communications from us by email or SMS. If you receive promotional email or SMS messages from us and would like to stop, you can do so by following the directions in that message or by contacting us as described in the “Contact Us” section below. These choices do not apply to certain informational communications including surveys and mandatory service communications.

There are certain browser and platform controls that may be available to you in order to opt-out from or otherwise control targeted advertising as described below. You can use the opt-out controls offered by the organizations our advertising partners may participate in, which you can access at:

- NAI (<http://optout.networkadvertising.org/>)
- DAA (<http://optout.aboutads.info/>)

You can use the other cookie or mobile ID controls described below.

These choices are specific to the device or browser you are using. If you access our services from other devices or browsers, you will need to take these actions from those systems to set applicable controls for those systems.

Some privacy laws define “sale” broadly to include some of the disclosures described in the “Our Disclosure of Personal Data” section above. To opt-out from such data “sales” you can use the Global Privacy Control setting or click on “Your Privacy Choices” on the bottom of our webpage.

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 website. 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 targeted 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.

Except for the automated controls described above, if you send us a request to exercise your rights or these choices, to the extent permitted by applicable law, we may decline requests in certain cases. For example, we may decline requests where granting the request would be prohibited by law, could adversely affect the privacy or other rights of another person, would reveal a trade secret or other confidential information, or would interfere with a legal or business obligation that requires retention or use of the data. Further, we may decline a request where we are unable to authenticate you as the person to whom the data relates, the request is unreasonable or excessive, or where otherwise permitted by applicable law.

Finally, please note that this Privacy Policy applies 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

MyStart Health may retain your information for as long as it believes necessary; as long as necessary to comply with its legal obligations, resolve disputes, and/or enforce its agreements; and/or as long as needed to provide you with the products and/or services of the Service or MyStart Health. MyStart Health may dispose of or delete any such information at any time except as set forth in any other agreement or document executed by MyStart Health or as required by law.

Similarly, the Medical Groups, Providers, Pharmacies, and Labs may retain your information for as long as they believe necessary; as long as necessary to comply with their respective legal obligations, resolve disputes and/or enforce its agreements; and/or as long as needed to provide you with their products and/or services. The Medical Groups, Providers, Pharmacies, and Labs may dispose of or delete any such

information at any time except as set forth in any other agreement or document executed by such parties or as required by law.

Other third parties with whom we share your information have their own policies and procedures with respect to how long they may retain your information and how and when they dispose of or delete your information.

Transactions

In connection with any transaction that you conduct through the Service (e.g., the purchase or sale of any products or services on or through the Service), 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 MyStart Health 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 Service, sellers on the Service) for the purpose of facilitating the transaction.

Jurisdictional Issues

The Service may only be used within certain states within the United States as described in our Terms and Conditions. Accordingly, this Privacy Policy, and our collection, use, and disclosure of your information, is governed by U.S. law.

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 practices, including the categories of personal information and sensitive personal information to be collected, the purposes for which such information is collected or used, whether such information is sold or shared, and how long such information is retained. You can find those details in this statement by clicking on the above links.

Right to Know. You have a right to request that we disclose to you the personal information we have collected about you. You also have a right to request additional information about our collection, use, disclosure, or sale of such personal information. Note that we have provided much of this information in this privacy statement. You may make such a “request to know” by visiting MyStartHealth.com/privacy or emailing us at support@MyStartHealth.com.

Rights to Request 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. To make a request to correct or delete, visit MyStartHealth.com/privacy or email us at support@MyStartHealth.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.

Note that the CCPA defines “sell,” “share,” and “personal information” very broadly, and some of our data sharing described in this privacy statement may be considered a “sale” or “sharing” under those definitions. In particular, we let advertising and analytics providers collect identifiers (IP addresses, cookie IDs, and mobile IDs), activity data (browsing, clicks, app usage), device data, and geolocation data through our sites and apps when you use our online services, but do not “sell” or “share” any other types of personal information. If you do not wish for us or our partners to “sell” or “share” personal information relating to your visits to our sites for advertising purposes, you can make your request by clicking on the “Do Not Sell or Share My Personal Information” link at the bottom of the page or using a Global Privacy Control. If you opt-out using these choices, we will not share or make available such personal information in ways that are considered a “sale” or “sharing” under the CCPA. However, we will continue to make available to our partners (acting as our service providers) some personal information to help us perform advertising-related functions. Further, using these choices will not opt you out of the use of previously “sold” or “shared” personal information or stop all interest-based advertising.

We do not knowingly sell or share the personal information of minors under 18 years of age

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 services or goods you request or as otherwise permitted by law.

To opt-out from such additional purposes, please visit click on “Your Privacy Choices” page or use the Global Privacy Control described in the “Choice and Control” section of this statement.

You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need 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.

Finally, you have a right to not be discriminated against for exercising these rights set out in the CCPA.

Additionally, under California Civil Code section 1798.83, also known as the “Shine the Light” law, California residents who have provided personal information to a business

with which the individual has established a business relationship for personal, family, or household purposes (“California Customers”) may request information about whether the business has disclosed personal information to any third parties for the third parties’ direct marketing purposes.

Please be aware that we do not disclose personal information to any third parties for their direct marketing purposes as defined by this law.

Miscellaneous

We strive to use reasonable physical, technical and administrative measures to protect information under our control. However, you must keep your Account password secure and your Account confidential, and you are responsible for any and all use of your Account. If you have reason to believe that the security of your Account has been compromised, please notify us immediately in accordance with 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. We do not currently respond to web browser 'do not track' signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. If we do so in the future, we will describe how we do so in this Privacy Policy. MyStart Health may supplement, amend, or otherwise modify this Privacy Policy at any time. Such supplements, amendments and other modifications will be posted on this or a similar page of the Service, and shall be deemed effective as of the 'Last Updated' date; provided, however, that MyStart Health will notify you and/or require you to accept the updated Privacy Policy if the supplemented, amended or otherwise modified Privacy Policy implements material changes from MyStart Health' then-current Privacy Policy. It is your responsibility to carefully review this Privacy Policy each time you visit, access or use the Service.

Contacting Us

If you have any questions about this Privacy Policy, please contact us by email at support@MyStartHealth.com