

Privacy Policy

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Hello, and welcome to Superpower!

Superpower Health, Inc. (“Superpower”) is a technology company that facilitates and provides Superpower users (“Members” or “you”) access to an efficient and streamlined process for obtaining laboratory testing, maintaining laboratory results, and receiving wellness information to assist Members in taking ownership of their health (the “Platform”).

This Privacy Policy describes the personal information we collect, how we use and protect it, and your rights and choices.

This Privacy Policy (“Privacy Policy”) explains how Superpower collects, uses, and discloses information about you obtained when you visit the website www.superpower.com (our “Website”) [and the Superpower web application (our “Application”) when you visit the website app.superpower.com] and our practices for collecting, using, maintaining, protecting, and disclosing that information on the Platform.

This policy applies to information we collect:

- on our Website[and Application];
- in email, text, and other electronic messages between you and our Website[and Application];
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- the physicians or other healthcare providers that we contract with, including Elite Home Detox, P.C.
- any third party, including through any application or content that may link to or be accessible from or on the Website[or Application].

Please read this policy carefully. By accessing or using our Website[and/or Application], you agree to this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the Website[or Application].

1. Children Under the Age of 18

Superpower does not knowingly collect or solicit any information from anyone under the age of 18 on its Website[or Application]. If we learn that we have inadvertently collected personal information from a child under age 18, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 18, please contact us using the contact details set out at the end of this Privacy Policy. We encourage parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

2. Information We Collect About You and How We Collect It

Generally

We collect several types of information from and about users of our Website[and Application], specifically information:

- by which you may be personally identified, such as name, postal address, billing address, work address, shipping address, e-mail address, home, work, and mobile telephone numbers, driver's license number, date of birth, credit or debit card number (for payment purposes only), the last four digits of your Social Security Number, your medical history, and health information ("Personal Data"); traffic data, location data, logs, referring/exit pages, date and time of your visit to our Website[or use of our Application], error information, clickstream data, and other communication data and the resources that you access and use on the Website[or through our Application]; and/or
- about your internet connection, the equipment you use to access our Website[or use our Application] and usage details.

We collect this information:

- directly from you when you provide it to us;
- automatically as you navigate through the Website[or use our Application]. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, geo-location services, and other tracking technologies; and
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website[or through our Application] are:

- information that you provide by filling in forms on our Website[or the Application]. This includes information provided at the time of registering to use our Website[or

Privacy Policy

Application], using our physician consultation services, or requesting further services. We may also ask you for information when you report a problem with our Website[or Application];

- records and copies of your correspondence (including email addresses), if you contact us;
- your responses to surveys that we might ask you to complete;
- details of transactions you carry out through our Website[or through the Application] and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website[or Application].

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website[and Application], we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, specifically:

- details of your visits to our Website[or Application], such as traffic data, location data, logs, referring/exit pages, date and time of your visit to our Website[or use of our Application], error information, clickstream data, and other communication data and the resources that you access and use on the Website[or in the Application]; and
- Information about your computer, mobile device, and internet connection, specifically your IP address, operating system, [and] browser type[, and Application version information].

The information we collect automatically may include Personal Data or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Website[and Application] and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- verify your location to ensure we can provide you with our services;
- store information about your preferences, allowing us to customize our Website[and our Application] according to your individual interests;
- recognize you when you return to our Website[and our Application].

The technologies we use for this automatic data collection may include:

- **Cookies.** A cookie is a small file placed on the hard drive of your computer or mobile device. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access certain parts of our Website[or use certain parts of our Application]. We presently do not honor “Do Not Track” requests across all parts of our Website[and Application]. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website[or use our Application].
- **Web Beacons.** Pages of our the Website[, screens of our Application,] and our emails may contain small electronic files known as web beacons that permit [Company], for example, to count users who have visited those pages, used those screens, or opened an email and for other related website and application statistics (for example, recording the popularity of certain Website[or Application] content and verifying system and server integrity).
- **Analytics Tools.** We use tools such as [Google Analytics] to collect certain information relating to your use of the Website and/or Application. Google Analytics uses “cookies”, which are text files placed on your computer or phone, to help us analyze how users use the Website. We may also use [Google Analytics Advertising Features] or other advertising networks to provide you with interest-based advertising based on your online activity. For more information regarding Google Analytics, you can visit Google Analytics’ webpage and review its privacy practices at www.google.com/analytics/learn/privacy.html. You may prevent your data from being used by Google Analytics by installing the Google Analytics Opt-out Browser Add-on from <https://tools.google.com/dlpage/gaoptout/>.

3. How We Use Your Information

We may use information that we collect about you or that you provide to us as follows, subject to restrictions in applicable law:

- To provide you with the Website[and Application] and full functionality on the Website[and Application].
- To provide the Platform.
- For business analytics purposes.
- For our own marketing purposes.
- To provide customer support to you.

Privacy Policy

- For account and network security purposes.
- To maintain legal and regulatory compliance.
- To enforce compliance with our agreements and policies.
- To service your Member account.
- To notify you when Website[and Application] updates are available.
- To create de-identified information such as aggregate statistics relating to the use of the Website[and Application].
- To fulfill any other purpose for which you provide us Personal Data.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We also may use how you browse and shop to show you ads for Superpower. We may use cookies and other information to provide relevant interest-based advertising to you. Interest-based ads are ads presented to you based on your browsing behavior to provide you with ads more tailored to your interests.

4. Disclosure of Your Information

We may disclose Personal Data that we collect or you provide as follows, and if we provide services on the Platform as a business associate, subject to the health information restrictions in the [Notice of Privacy Practices](#):

- to our subsidiaries and affiliates;
- to contractors and third-party service providers that we use to support our business and who are contractually bound to keep your Personal Data confidential;
- to a company we merge, acquire, or that buys us, or in the event of change in structure of our company of any form;
- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;

- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Superpower, our customers, or others;
- for any other purpose disclosed by us when you provide the information;
- with your consent.

At times we may provide third parties with certain personal information to provide or improve our products and services, including to help us market to consumers.

5. Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Tracking Technologies and Advertising.** You can set your browser or operating system to refuse all or some cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Website[or Application] may then be inaccessible or not function properly.
- **Promotional Offers from Superpower.** If you do not wish to have your email address used by Superpower to promote our own services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us or logging onto your Account profile page. This opt-out does not apply to information provided to Superpower as a result of your use of our Platform.
- **Targeted Advertising.** We use or partner with ad networks that may use your browsing activity across participating websites to show you interest-based advertisements on those websites. To learn more about interest-based advertisements and your opt-out rights and options, visit the **Digital Advertising Alliance** and the **Network Advertising Initiative** websites (www.aboutads.info and www.networkadvertising.org). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the Network Advertising Initiative on its website.
- **Access, Correction, and Deletion.** You may request to access, correct, and/or delete your Personal Data that we hold by sending a request to compliance@superpower.com. Please be aware that we may be required (by law or otherwise) to verify your identity before honoring your request. We may also be required (by law or otherwise) to keep such data and not delete it (or to retain it for a certain period of time, in which case it will be deleted after the required retention period). By deleting your Personal Data, we will remove it from active databases, however, it may remain in archives and we also may

continue to use De-Identified Data (defined below) about your use of the Platform. If we have disclosed Personal Data to third parties as permitted under this Privacy Policy, we may no longer be able to access, or allow you to access, this data and/or be able to compel its deletion or modification by such party. After we delete Personal Data, we may retain De-Identified Data and will continue to use De-Identified Data as permitted under this Privacy Policy and applicable law.

6. Information You Share with Third Parties

This Privacy Policy applies only to information we collect through the Website [and Application] and by email, text and other electronic communications between you and our Website[or Application]. We do not control the collection and use of your information collected by any third parties, and are not responsible for the privacy practices of other sites. We encourage you to read their privacy policies.

7. De-Identified Data

We may create and use de-identified information, in which information is removed from your Personal Data so that you cannot be identified (“De-identified Data”), without restriction.

8. Data Security

We implement reasonable measures designed to secure your Personal Data from unauthorized access, use, alteration, and disclosure and from accidental loss, including by employing encryption technology for information sent and received by us.

Nonetheless, no transmission of information over the internet can be completely secure. As a result, while we do our best to try to protect your Personal Data, we cannot guarantee the security of any information you transmit to us.

9. Changes to Our Privacy Policy

We may change this Privacy Policy at any time. We will post the revised Privacy Policy on this page with the last revised date identified at the top. [We also will present any significant updates to you before you next use the Application.] Continued use of our Website[, Application,] or Platform following notice of such changes will indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

10. Contact Information

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at compliance@superpower.com.