

## The Soul Medic, Inc. Privacy Policy

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The Soul Medic, Inc. (“we”, “us”, “our”, and “Company”) is committed to protecting your privacy through our compliance with this Privacy Policy (“Privacy Policy”). This Privacy Policy describes the types of information we may collect from you or that you may provide through our website(s), our mobile application, our marketing materials, the services we provide, and any products and other materials we may provide (collectively, the “Services”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies to information we collect:

- through the Services;
- In email, text, and other electronic messages between you and the Services; and
- When you interact with our advertising and applications on third party websites and services, if those applications or advertising include links to this Privacy Policy.

This Privacy Policy does not apply to information collected by:

- us offline or through any other means, including without limitation on any other website operated by us or any third party; or
- any third party including without limitation through any application or content (including without limitation advertising) that may link to or be accessible from or through the Services.

By accessing or using the Services, you agree to this Privacy Policy. If you do not agree with this Privacy Policy, your choice is not to use the Services. This Privacy Policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes.

### **Children Under the Age of 16**

The Services are not intended for children under 16 years of age. No one under age 16 may provide any information to the Services. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on the Services or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we

will delete that information. If you believe we might have any information from or about a child under 16, please contact us at Support@TheSoulMedic.com.

**Information We Collect About You**

We collect several types of information from and about you, including without limitation information:

- That identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with you, your household, or a device, such as your first and last name, mailing address, email address, telephone number, social security number, and any other identifier by which you may be contacted online or offline (collectively “Personal Information”);
- That is about you but does not individually identify you, such as your age and gender; and
- About your internet connection, the equipment you use to access the Services, and usage details.

Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Health or medical information covered by the Health Insurance Portability and Accountability Act; and
- Personal information covered by certain sector-specific privacy laws, including without limitation the Fair Credit Reporting Act and the Gramm-Leach-Bliley Act.

In particular, we have not collected the following categories of information from users within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	<b>NO</b>
B. Personal information categories listed in the California Customer Records statute.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card	<b>NO</b>

	<p>number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	
C. Protected classification characteristics under certain state or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<b>NO</b>
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<b>NO</b>
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	<b>NO</b>
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<b>NO</b>
G. Geolocation data.	Physical location or movements.	<b>NO</b>
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	<b>NO</b>
I. Professional or employment-related information.	Current or past job history or performance evaluations.	<b>NO</b>
J. Non-public education information.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	<b>NO</b>
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<b>NO</b>

## How We Collect Information About You

We collect information about you:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Services;
- From third parties, for example, our business partners; and
- From internet service providers, data analytic providers, operating systems, and social networks.

## *Information You Provide to Us*

The information we collect on or through the Services may include:

- Information that you provide by filling in forms on the Services. This includes information provided at the time of registration, subscribing to the Services, posting material, or requesting further services. We may also ask you for information when you report a problem with the Services.
- Records and copies of your correspondence including without limitation email addresses, if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the Services and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the Services.
- Your search queries on the Services.
- Any other type of information you provide to us.

You also may provide or create information to be transmitted to other users of the Services or third parties ("User Contributions"). Your User Contributions are transmitted to others at your own risk. Although we limit access to certain pages, you may set certain privacy settings for such information by logging into your account profile. Be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Services with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### ***Information We Collect Through Automatic Data Collection Technologies***

As you navigate through and interact with the Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including without limitation:

- Details of your visits to the Services, including without limitation usage details, time zone, individual webpages that you view, what website or search terms referred you to the Services, and information collected through cookies, web beacons, log files, tags, and other tracking technologies; and
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services. This data is used to deliver customized content and advertising within the Services to customers whose behavior indicates that they are interested in a particular subject area.

There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser.

The information we collect automatically may include Personal Information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve the Services and to deliver a better and more personalized experience, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Services.

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

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain

parts of the Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Services.

- **Web Beacons.** The Services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to count users who have visited those pages or opened an email and for other related website statistics.

We do not collect Personal Information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

### **Third Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Services are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **How We Use Your Information**

We may use, sell, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop the Services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through the Services, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of the Services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve the Services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in applicable law.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our users is among the assets transferred.
- For any other purpose with your consent.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

### **Sharing Personal Information**

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has not disclosed personal information for a business purpose.

We may disclose aggregated information about our users, and information that does not identify any individual without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users is among the assets transferred.
- To third parties to market their products or services to you if you have consented to or not opted out of these disclosures.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Services, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use <https://TheSoulMedic.com/TermsOfService> and other agreements, including for billing and collection purposes.



- If we believe disclosure is necessary or appropriate to protect our rights, property, or the safety of our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

The categories of Personal Information we may disclose include:

- Identifying Information, such as name, email address, physical location, for example, street address, city, state, and zip code
- Credit card information
- Device information
- Tracking information

We do not sell your Personal Information.

In the preceding twelve (12) months, Company has not sold the following categories of personal information to the categories of third parties indicated in the chart below. For more on your personal information sale rights, see Personal Information Sales Opt-Out and Opt-In Rights.

Personal Information Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales
A: Identifiers.	None	None
B: California Customer Records personal information categories.	None	None
C: Protected classification characteristics under California or federal law.	None	None
D: Commercial information.	None	None
E: Biometric information.	None	None
F: Internet or other similar network activity.	None	None

G: Geolocation data.	None	None
H: Sensory data.	None	None
I: Professional or employment-related information.	None	None
J: Non-public education information.	None	None
K: Inferences drawn from other personal information.	None	None

### Reselling Personal Information

The California Consumer Privacy Act (“[CCPA](#)”) prohibits a third party from reselling Personal Information unless you have received explicit notice and an opportunity to opt-out of further sales.

### Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Services may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes. You can also always opt-out by logging into the Services and adjusting your user preferences in your account profile or by sending us an email with your request to [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com)
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own or third parties’ products or services, you can opt-out by logging into the Services and adjusting your user preferences in your account profile or by sending us an email stating your request to [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com). If we have sent you a promotional email, you may send us

a return email asking to be omitted from future email distributions. This opt-out does not apply to information provided to the Company as a result of a product purchase, product service experience, or other transactions.

- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by sending your request to [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com).

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 opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's [website](#).

### **Your Rights and Choices**

The CCPA provides consumers who are California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Right to Know and Data Portability***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months ("right to know"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and

- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

We do not provide a right to know or data portability disclosure for B2B personal information.

### ***Right to Delete***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions ("[right to delete](#)"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or de-identify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

### ***Exercising Your Rights to Know or Delete***

To exercise your rights to know or delete described above, please submit a request by either:

- [Visiting [www.thesoulmedic.com](http://www.thesoulmedic.com)
- [Emailing us at [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com).

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may also make a request to know or delete on behalf of your child by contacting support at [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com)

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
  - Providing a photo copy of your Driver's License
  - PARENT OR GUARDIAN VERIFICATION REQUIREMENTS:
    - Last 4 digits of Social Security Number
    - Date of Birth
    - Mailing Address
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete. However, we do consider requests made through your password-protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

### ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact Support at [support@TheSoulMedic.com](mailto:support@TheSoulMedic.com) or write us at 3463 Pine Ridge Road #101 Naples, FL 34109.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Personal Information Sales Opt-Out and Opt-In Rights***

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time ("right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years old, unless we receive affirmative authorization ("right to opt-in") from either the consumer who is between 13 and 15 years old, or the parent or guardian of a consumer less than 13 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

### **[Do Not Sell My Personal Information](#)**

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by visiting [www.thesoulmedic.com](http://www.thesoulmedic.com) and entering your email address.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

### **Accessing and Correcting Your Information**

You can review and change your Personal Information by logging into the Services and visiting your account profile page.

You may also send us an email at [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com) to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Services, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other users. Proper access and use of information provided on the Services, including User Contributions, is governed by our terms of use <https://TheSoulMedic.com/TermsOfService>.

**We will not discriminate against you for exercising your rights.**

We will not discriminate against you for exercising any of your privacy rights. Unless permitted under applicable laws, solely due to the exercise of your rights hereunder, we will not:

- deny you goods or services;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide you a different level or quality of goods or services; or
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to Support@TheSoulMedic.com or write us at: 3463 Pine Ridge Road #101 Naples, FL 34109.

### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. You are responsible for keeping your log-in credentials confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Services. Any transmission of personal information is at your own



risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

### **Changes to This Privacy Policy**

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated notice on the Services and update the notice's effective date. Your continued use of the Services following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information described in this Privacy Policy, your choices, and rights regarding such use, or wish to exercise your rights, please contact us at:

The Soul Medic, Inc.  
3463 Pine Ridge Rd.  
Unit 101  
Naples, FL 34109  
Email Address: [Info@TheSoulMedic.com](mailto:Info@TheSoulMedic.com)

If you need to access this Privacy Policy in an alternative format due to having a disability, please contact us at [Support@TheSoulMedic.com](mailto:Support@TheSoulMedic.com).