

# Acelpa Health – General Privacy Policy

Last Updated June 3, 2025.

Acelpa Health, LLC and its affiliates ("we," "our," or "us") respect your privacy. Acelpa Health owns and operates the website found at www.acelpahealth.com, other websites, our mobile applications and other services that link to this General Privacy Policy (collectively, the "Services"). This General Privacy Policy describes the types of information we collect about you ("you", "your") and your use of our Services and how we use, store, and disclose that information. If you are a resident of California, you may be entitled to additional rights and information covered in our California Privacy Policy.

By accessing or using the Services, you agree to the terms of this General Privacy Policy. This General Privacy Policy is binding on all those who access the Services, whether acting as an individual or on behalf of an entity, including you and all persons, entities, or digital engines of any kind that harvest, crawl, index, scrape, spider, or mine digital content by an automated or manual process or otherwise. If you do not agree to be bound by this General Privacy Policy or any subsequent modifications, you should not access the Services or disclose any personal information through the Services. This General Privacy Policy is incorporated into our <u>Website Terms of Use</u>.

This General Privacy Policy does not apply to medical and treatment information collected by us or health care providers who use our services. This information is considered Protected Health Information ("<u>PHI</u>") and is regulated by the Health Insurance Portability and Accountability Act ("<u>HIPAA</u>"). Please refer to our <u>HIPAA Notice</u> which explains how PHI is used and disclosed, and what rights exist related to PHI. ACELPA HEALTH CANNOT AND DOES NOT ASSUME ANY RESPONSIBILITY FOR YOUR USE OR MISUSE OF PHI OR OTHER INFORMATION TRANSMITTED, MONITORED, STORED, OR RECEIVED WHILE USING THE SERVICES.

This General Privacy Policy contains the following information, which you can access by scrolling down:

- 1. Personal Information We Collect
- 2. How We Use Your Personal Information
- 3. How We May Disclose Your Personal Information
- 4. International Transfers of Personal Information
- 5. Security of Your Personal Information
- 6. How Long We Keep Your Personal Information
- 7. Children's Privacy
- 8. Limits of Our Policy
- 9. Changes to This Policy
- 10. Governing Law and Jurisdiction
- 11. Contact Us

#### 1. <u>Personal Information We Collect</u>

Depending on how you use or interact with our Services, we collect different types of personal information about you. Personal information is information that identifies, relates to, describes, can reasonably be associated with, or can reasonably be linked to a particular individual or household. We collect information from you both when you provide it voluntarily and also automatically when you access the Services. We may also collect personal information from other sources, as described below. We collect personal

# Acelpa Health

information from you and any devices (including mobile devices) you use when you use the Services. The categories and sources of personal information we may collect and generate about you depending on your interactions with the Services include:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers;
- Internet or other similar network activity. This may include browsing history, including data about the webpages you visit before and after visiting the Services and web browser specifications, search history, including the search terms you enter through our search function on the Services, or information on a consumer's interaction with a website, application, or advertisement;
- Commercial information, such as transaction information provided by you when using the Services, including name, billing address, government identification numbers, bank account information, and credit card information. and purchase history;
- Biometric information. This may include genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish your identity;
- Geolocation data, such as device location;
- Audio, electronic, visual, and similar information, such as call and video recordings;
- Professional or employment-related information; and this may include current or past job history or performance evaluations.

#### Cookies and Tracking Technologies:

Our Services may make use of tracking technologies to provide you with certain functionalities, which collect or generate personal information about you when you interact with us.

- Cookies: A cookie is a small file placed on your hard drive by some of our web pages. When you
  access our Services, either through our mobile applications or website, certain information is
  automatically collected. We, or third parties we do business with, may use cookies to help us analyze
  our web page flow, customize the Service, content and advertising, measure promotional
  effectiveness, and promote trust and safety. This information will be collected every time you access
  the Services, and it will be used for the purposes outlined in this General Privacy Policy.
- Google Analytics: Google Analytics uses cookies to collect data such as time of visit, website pages visited, time spent on each of our web pages, IP address, URL, and type of operating system. To learn more about how Google Analytics collects and processes personal information, please visit www.google.com/policies/privacy/partners. To opt out of having your activity available to Google Analytics, you can download the Google Analytics opt-out browser add-on.



#### Your Settings and Preferences:

You can reduce the information cookies and other technologies collected from you by adjusting your browser settings to notify you when a cookie is being set or updated, or to block cookies entirely. For more information about how to do this, visit <u>www.allaboutcookies.org/manage-cookies</u> or in the "Help" section of your browser. You may opt-out from receiving personalized advertising from some third parties by visiting here. If you choose to block cookies, your use of the Service may be impacted.

#### 2. How We Use Your Personal Information

Depending on how you interact with us and what Services you use, we may use your personal information to do the following:

- To administer and provide our Services;
- To manage and conduct business transactions;
- To respond to your inquiries and provide information about our Services;
- To send you marketing information;
- To send you advertisements you may be interested in;
- · To improve the Services and user experience;
- To respond to your inquiries;
- To send you appointment reminders;
- To conduct research such as case studies and academic research;
- To carry out analytics, quality control, security processes and similar activities, in order to identify and develop potential improvements to the Services;
- To process payments from you.

#### 3. How We May Disclose Your Personal Information

We may disclose your personal information to the following parties, and for the following reasons, in accordance with applicable law:

- Our employees, contractors, and/or related entities;
- · Our existing or potential agents or business partners;
- Courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights;
- Software and service providers we use to manage and process your information, for example, customer service providers.
- Marketing service providers we use to communicate with you.
- Advertising service providers we use to assist us in providing personalized advertising on third party websites;
- Third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- Financial and payment technology providers.
- Background check companies when you apply for jobs with us;
- And to fulfill the purpose for which you provide it.

# 🔁 Acelpa Health

If we receive personal information about you from a third party, we will protect it as set out in this General Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

#### 4. International Transfers of Personal Information

The personal information we collect is stored and/or processed where we or our partners, affiliates, and third-party providers maintain facilities. Please be aware that the locations to which we store, process, or transfer your personal information may not have the same data protection laws as the country in which you initially provided the information. If we transfer your personal information to third parties in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this General Privacy Policy.

### 5. <u>Security of Your Personal Information</u>

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use, or modification. Although we will strive to use commercially acceptable means to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security. As a result, we cannot guarantee or warrant the security of any information you disclose or transmit to us or that are otherwise provided to us, and we cannot be responsible for the theft, destruction, or inadvertent disclosure of information. Any transmission of personal information is at your own risk. By using the Services, you acknowledge and accept these risks. We will comply with laws applicable to us in respect of any data breach. You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services.

#### 6. How Long We Keep Your Personal Information

We keep your personal information only for as long as we need to. This period may depend on what we are using your information for, in accordance with this General Privacy Policy. If your personal information is no longer required for the purposes described above, we will delete it or make it anonymous by removing all details that identify you. However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

## 7. <u>Children's Privacy</u>

We do not aim any of our products or services directly at children under the age of 13. By using the Services, you represent that you are at least 13 years old. If you do not meet this age requirement, then you must not access or use the Services.

We do not knowingly collect personal information about children under 13. If you are a parent or guardian and you are aware that your Child has provided us with personal information, please contact us though one of the methods listed under "Contact Us" below. If we become aware that we have collected personal information from Children without verification of parental consent, we take reasonable steps to remove that information from our servers.

# 🔁 Acelpa Health

For more information about the Children's Online Privacy Protection Act ("<u>COPPA</u>"), which applies to websites that direct their services to children under the age of thirteen (13), please visit the Federal Trade Commission's website at https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions.

### 8. <u>Limits of Our Policy</u>

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices.

### 9. <u>Changes to This Policy</u>

At our discretion, we may change this General Privacy Policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this General Privacy Policy, we will post the changes here at the same link by which you are accessing this General Privacy Policy. Please review this General Privacy Policy periodically for any updates or changes.

### 10. <u>Governing Law and Jurisdiction</u>

This General Privacy Policy shall be construed and governed under the laws of the United States and State of California (without regard to rules governing conflicts of laws provisions). You agree that venue for all actions, arising out of or relating in any way to your use of the Services, shall be in a state or federal court sitting in Los Angeles County, CA. Each party waives any objections based on forum non conveniens and waives any objection to venue of any action instituted hereunder to the extent that an action is brought in the courts identified above. Each party consents to personal jurisdiction in the courts identified above.

## 11. <u>Contact Us</u>

For any questions or concerns regarding your privacy, you may contact us using the following details:

- Mail: 12110 Hadley Street, Whittier, CA 90601
- Attn: Corporate Compliance
- Email: privacy@acelpahealth.com

**Phone:** (877) 602-7779