

Privacy Policy: August 2023.

Thank you for taking the time to review the Privacy Policy for **A Chiropractic Hub**.

We are confident that your experience with A Chiropractic Hub will be a great one. Our mission is, to stand out as clear and transparent as possible about how we handle your personal and professional data.

This Privacy Policy (the “**Policy**”) is made and entered into by and between you and the **A Chiropractic Hub LLC**, its affiliates, and Operators (“**A Chiropractic Hub**”, “The Hub”, “**us**”, “**we**”, or “**our**”).

This Policy describes the type of information we collect from you when you interact with our websites, mobile applications, our premises and thus any products or materials, and or services provided by A Chiropractic Hub (collectively, the “**Services**”).

This Policy also explains the purposes and usage and procedures for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the mobile application, website and through your use of the Services generally (including when you register for an account), and through communications between you and the Website (including email, text, and other electronic messaging). Understand this also applies to information collected through any **in-person** interaction with us.

This Policy does *not* apply to information collected by third parties, including any websites, services, and applications that you permit yourself access through.

Please review this Policy carefully. By accessing or using the Services (or by clicking on “accept” or “agree” to this Policy when prompted), you agree to the terms of this Policy on behalf of yourself and/or the entity or organization that you represent. If you do not agree to any term in this Policy, you should refrain from further use of our Services.

Children Using or Accessing the Services:

No one under the age of eighteen (18) may provide any personal information to or on the Services without verifiable parental consent. Please note that we do not knowingly collect any personally identifiable information from children under the age of eighteen (18) without obtaining verifiable consent from that child’s parent or guardian (“**Parental Consent**”), except for the limited amount of personally identifiable information we need to collect in order to obtain Parental Consent (“**Required Information**”). Until we have received Parental Consent, we will only use Required Information for the purpose of

obtaining Parental Consent. If you are a child under the age of eighteen (18), please do not attempt to use or register for the Services or send any personal information about yourself to us before we obtain Parental Consent, except for the Required Information for purposes of the Parental Consent process. If you are a parent or legal guardian and think that your child under the age of eighteen (18) has given us information (beyond the Required Information) without our obtaining Parental Consent, please contact us at hubteam@achirohub.com

Changes to Our Privacy Policy:

This Policy was last revised on the date noted at the top of this page. We reserve the rights to update this Policy from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Information We Collect:

We receive several types of information about you from various sources, including but not limited to:

- (a) information and content that you give us.
- (b) automatically collected information.
- (c) demographic information or other aggregate information.
(Information types we collect is listed in detailed below.)

Information and Content That You Give Us:

We collect personal information that you knowingly choose to disclose. This may include:

- (a) **Personal Information:** Personal information includes your name, address, email address, phone number, username, password birth date, and any other information you directly provide us on or through the Services. This includes information you provide when you check into one of our clubs, register or create an account, complete a questionnaire or a contest entry form, or make a request for customer service.
- (b) **Correspondences:** This information includes records and copies of your text, email messages and phone correspondence together with your email address, phone number and our responses. If you choose to correspond with us through email, and records of your phone number, phone calls with us, and voice messages, if you choose to correspond with us via phone.
- (c) **User Content:** This information includes any and all content you submit to be published or displayed on public areas of the Services or transmitted to other users of the Services or third parties (collectively, “User Content”). Your User Content is posted and transmitted to others at your own risk. The Company cannot control the actions of other users of the Services with whom you may

choose to share your User Content. Therefore, we cannot and do not guarantee that your User Content will not be viewed by unauthorized persons.

- (d) **Transaction Information:** This Information includes any activity, purchase or transactions made on the Services. This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping, and contact details. We use PayPal (“PayPal”) to process payments. By using our Services, you grant us and PayPal the right, power and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored and processed by PayPal in accordance with their respective Privacy Policies.

Information We Collect Automatically:

We automatically receive and record information from your use of the Services, including but not limited to: app usage, your IP address browser type, Internet service provider, referring/exit pages, operating system, date/time stamp, clickstream data, and cookie information. This information is used to optimize your user experience. Generally, the Services automatically collect usage information, such as the number and frequency of users of the Services. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally (“Aggregate Information”). This type of Aggregate Information enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them. We may use a variety of technologies to collect certain information about your equipment, browsing actions, and patterns whenever you interact with the Services, including:

- (a) **Activity Information:** Details of your visits to our Services, including the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; the time, frequency, and duration of your activities; and other information about your use of and actions on the Services.
- (b) **Equipment Information:** Information about your computer and internet connection, including your computer operating system, IP address, browser type, and browser language.
- (c) **Location Information:** Information about the location of your device, including GPS location, for purposes of enhancing or facilitating the Services. We may also use information about the location of the device you are using to help us understand how the Services and functionality are being used and to deliver more relevant advertising. The gathering of this information may be used for

maintaining the quality of the Services we provide, as well as providing overall general statistics related to the use of the Services. The technologies we use for this automatic data collection may include:

- (1) **Cookies:** A cookie is a small data file stored on the hard drive of your computer either for only the duration of your visit on a website (“session cookies”) or for a fixed period (“persistent cookies”). Cookies contain information that can later be read by a web server. We may use cookies to provide you with a more personal and interactive experience on the Services.
- (2) **Web Beacons:** Web beacons (also known as “clear gifs”, “pixel tags”, “web bugs”, and “single-pixel gifs”) are small files that are embedded in webpages, applications, and emails. Web beacons allow the Company, for example, to track who has visited those webpages or opened an email, test the effectiveness of our marketing, and compile other related website statistics.
- (3) **JavaScripts:** JavaScripts are code snippets embedded in websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components.
- (4) **Entity Tags:** Entity Tags are HTTP code mechanisms that allow portions of websites to be stored or “cached” within your browser and validates these caches when the website is opened, accelerating website performance since the web server does not need to send a full response if the content has not changed.
- (5) **HTML5 Local Storage:** HTML5 local storage allows data from websites to be stored or “cached” within your browser to store and retrieve data in HTML5 pages when the website is revisited.
- (6) **Resettable Device Identifiers:** Resettable device identifiers (also known as “advertising identifiers”) are similar to cookies and are found on many mobile devices and tablets (e.g., the “Identifier for Advertisers” or “IDFA” on Apple iOS devices and the “Google Advertising ID” on Android devices), and certain streaming media devices. Like cookies, resettable device identifiers are used to make online advertising more relevant.

This Policy does not cover the use of tracking technologies by third parties. The Services may contain links, content, advertising, or references to other websites by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies 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 about your online activities over time and across different websites. Please be aware that we do not control these third parties’ tracking technologies or when and how they may be used. Therefore, the Company does not claim nor accept responsibility for any privacy policies,

practices, or procedures of any third party. We encourage you to read the privacy statements and terms and conditions of linked or referenced websites you enter. If you have any questions about an ad or other targeted content, you should contact the responsible provider directly.

Demographic Information:

We may collect demographic, statistical, or other aggregate information that is about you, but individually does not identify you. Some of this information may be derived from personal information, but it is not personal information and cannot be tied back to you. Examples of such aggregate information include gender, age, race, household income, and political affiliation.

Information from Other Sources:

We may receive information about you from other sources and add it to our account information. We protect this information according to the practices described in this Policy, plus any additional restrictions imposed by the source of the data. These sources may include online and offline data providers, from which we obtain demographic, interest-based, and online advertising related data; publicly-available sources such as open government databases or social networks; and service providers who provide us with information, or updates to that information, based on their relationship with you. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions, and give you product or service recommendations and special offers that are more likely to interest you.

How We Use Your Information:

We may use the information we collect about you in a variety of ways, including:

- (a) to provide the Services and its content to you;
- (b) to respond to comments and questions, and provide customer service;
- (c) to fulfill the purpose for which you provide such information, or fulfill any other purpose disclosed by us when you provide the information;
- (d) to communicate with you about your use of the Services;
- (e) to inform you about important changes to, or other news about, the Services or any of its features or content;
- (f) to operate, maintain, improve, personalize, and analyze the Services;
- (g) to monitor and analyze trends, usage, and activities for marketing or advertising purposes;
- (h) to detect, prevent, or investigate security breaches, fraud, and other unauthorized or illegal activity;
- (i) to carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection;

- (j) to maintain appropriate records for internal administrative purposes;
- (k) to allow you to participate in interactive features on the Services;
- (l) to send promotional communications, such as information about features, newsletters, offers, promotions, contests, and events;
- (m) to share information across the Company's products, services, and devices to provide a more tailored and consistent experience on all Company products, services, and devices that you use;
- (n) to develop, test, troubleshoot, and improve new products, services, and features, including by conducting surveys and research, and testing and troubleshooting new products, services, and features;
- (o) if you are engaging in the Services through your employer, to communicate with your employer about your usage of the Services;
- (p) in any other way we may describe when you provide the information; and
- (q) for any other purpose with your consent.

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.

How We Share Your Information:

We may disclose aggregated or anonymized information about our users without any restrictions. We will not share your personal information that we collect or you provide as described in this Policy except in the following circumstances:

- (a) ***With your company.*** If you engage with the Services through your employer, then you consent to **A Chiropractic Hub** sharing your information, including personal information with your employer.
- (b) ***With subsidiaries and affiliates for business purposes.*** To our subsidiaries and affiliated companies for purposes of management and analysis, decision-making, and other business purposes.
- (c) ***When we work with service providers.*** To service providers, professional advisors, contractors, and other third parties that provide us with support services, such as payment processing, website hosting, information technology, sales, email and postal delivery, location mapping, product and service delivery, or analytics services, 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.

- (d) ***When we become involved in a sale or transfer of the Company.*** If we become involved with a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all the Company's assets (whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding), to business entities or people involved in the negotiation or transfer.
- (e) ***When we are required by law.*** To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- (f) ***When we enforce our rights.*** To enforce or apply this Policy, our Terms of Use, and other agreements, including for billing and collection purposes.
- (g) ***To help protect lawful interests.*** If we believe disclosure will help us protect the rights, property, or safety of the Company, our users, partners, agents, and others. This includes exchanging information with other companies and organizations for fraud protection, and spam and malware prevention.
- (h) ***To fulfill the purpose for that information or with your consent.*** To fulfill the purpose for which you provide the information, for any other purpose disclosed by us when you provide the information, or with your consent.
- (i) ***When we work with marketing service providers.*** To marketing service providers to assess, develop, and provide you with promotions and special offers that may interest you; administer contests, sweepstakes, and events; or for other promotional purposes.
- (j) ***When we work with business partners.*** To third parties whom we have strategic marketing alliances or partnerships with to provide you information regarding products and services that we think will be of interest to you.
- (k) ***Third-party platforms and social media networks.*** To third-party platforms and social media networks, if you have enabled features or functionality that link the Services to such a platform or network (such as logging into the Services using your account with the third party).
- (l) ***Aggregate Information.*** We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non-Personal Data about you that they have independently developed or acquired.

Information that you post on or through the public areas of the Services (e.g., in chat rooms, bulletin boards, and discussion groups) are generally accessible to, and may be collected and used by, others and may result in unsolicited messages or other forms of contact from others. Users of the Services are encouraged to exercise caution when providing personal information about themselves in public or interactive areas.

Your Choices:

Mechanisms to Control 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:

- (a) ***Cookies and Other Tracking Technologies.*** You may be able to set your browser to reject cookies and certain other technologies by adjusting the appropriate settings in your browser. Each browser is different, but many common browsers have preferences that may be adjusted to allow you to either accept or reject cookies and certain other technologies before they are set or installed, or allow you to remove or reject the use or installation of certain technologies altogether. We recommend that you refer to the Help menu in your browser to learn how to modify your browser settings. Please note that you cannot remove Flash cookies simply by changing your browser settings. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies or other tracking technologies, please note that some parts of the Services may become inaccessible or may not function properly.

- (b) ***Promotional Communications from the Company.*** If you do not wish to have your contact information used by the Company to promote our own or third-party products or services, you can opt out by (i) informing us of your preference at the time you register for an account, complete an order form, sign up for our newsletter, or complete any other form on or through the Services which we collect your data; (ii) modifying your user preferences in your account profile; (iii) following the opt-out instructions in the promotional emails we send you; or (iv) sending us an email stating your request. Please note that if you opt out of receiving promotional communications from us, we may still send you transactional communications, including emails about your account or purchases.

- (c) ***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 opt out by (i) informing us of your preference at the time you register for an account, complete an order form, sign up for our newsletter, or complete any other form on or through the Services which we collect your data; (ii) modifying your user preferences in your account profile; (iii) following the opt-out instructions in the promotional emails we send you; or (iv) sending us an email stating your request.

(d) **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 modifying your user preferences in your account profile. 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.

Accessing and Correcting Your Information:

You may send us an email to request access to correct, or remove any personal information that you have provided to us. We cannot delete your personal information unless we delete your 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 Content from the Services or your account, copies of your User Content may remain viewable in cached and archived pages, or might have been copied or stored by other users of the Services.

How We Protect Your Information:

We take reasonable precautions to secure your personal information. [We have implemented technical, physical, and administrative security measures designed to reduce the risk of loss, misuse, unauthorized access, disclosure, or modification of your information. We have put in place appropriate physical, electronic, and managerial procedures to safeguard the information we collect. All information you provide to us is stored on secure servers behind firewalls.

When you transmit highly sensitive information (such as a credit card number) through the Services, we encrypt the transmission of that information using Secure Sockets Layer (SSL) technology. The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

While we have employed security technologies and procedures to assist safeguarding your personal information, no system or network can be guaranteed to be 100 percent secure. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. 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 Website or any other Services.

Terms of Use.

If you choose to visit the Services, your visit and any dispute over privacy is subject to this Policy and our Terms of Use, including limitations on damages, resolution of disputes, and application of the law of the state of Georgia.

For more questions, feel free to reach out to us at: hubteam@achirohub.com