

PRIVACY POLICY

Effective Date: August 25, 2026

Introduction & Scope

This Privacy Policy explains how Cell Beauty Health, its clinical operations partner My Vitality, Inc., and Medical Director Wael Tamim, MD (collectively, the "Company," "we," "us," or "our") collect, use, disclose, and otherwise process Personal Data and Sensitive Personal Information in connection with the wellness, longevity, and health-related consultative services delivered through the Cell Beauty Health website, the patient portal, Company applications, and any other associated websites, subsites, domain redirects, or online platforms operated by or referring to the Company (collectively, the "Service" or "Platform"). This Privacy Policy applies to all individuals who access or use the Platform ("Users," "you," or "your"). By using the Service, you acknowledge and agree that your Personal Data will be handled in accordance with this Privacy Policy. The Service is strictly intended for adults aged 18 and over.

IMPORTANT NOTICE regarding HIPAA

CELL BEAUTY HEALTH AND MY VITALITY, INC. ARE NOT "COVERED ENTITIES" OR "BUSINESS ASSOCIATES" UNDER THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA). Any health, wellness, physiological, or body composition information you share with us through the Platform or during consultative voice/video calls is not subject to HIPAA protections and is instead governed solely by this Privacy Policy and applicable U.S. state privacy laws.

Note: Certain contracted independent partner Providers or Pharmacy Network partners may be "covered entities" under HIPAA, and their handling of your Protected Health Information (PHI) is governed by HIPAA. To the extent the secure patient portal hosts clinical records created by your partner Providers, those specific health records are stored and transmitted in compliance with HIPAA-compliant standards.

1. Categories of Personal Data Collected

We collect Personal Data directly from you, automatically through your interaction with the Platform, and from trusted third-party service providers:

- Identifiers: First name, last name, email address, physical address, phone number, ZIP/postal code, account password, and unique IP address.

- **Device and Technical Data:** Device hardware specifications, operating system, browser type, device logs, and application diagnostic statistics.
 - **Location Data:** General geographical data (city, state, province, country) and approximate latitude/longitude coordinates.
 - **Usage and Interaction Data:** Page views, clicks, browsing history, portal search activity, session duration, scroll behavior, heat maps, and custom application interaction events.
 - **Health and Wellness Data:** Clinical information voluntarily disclosed through service forms, health assessments, intake questionnaires, telephonic or video consultations, and program interactions.
 - **Audiovisual Information:** Photographs, video recordings, or audio files uploaded by you or transmitted during remote voice/video consultations. Telehealth voice/video consultations are never recorded without your separate, explicit prior written consent.
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2. Methods of Processing & Security

We implement industry-standard administrative, physical, and technical safeguards (including secure SSL encryption during transmission) designed to protect your Personal Data and Sensitive Personal Information against unauthorized access, disclosure, loss, misuse, or alteration. Access to your data is strictly restricted to authorized personnel who need to know such information to operate the Service and coordinate your care. However, perfect security on the internet is impossible, and you accept the risks associated with electronic transmission.

3. Retention of Data

We retain each category of Personal Data for as long as is necessary to fulfill the consultative wellness purposes for which it was collected, as required to comply with clinical recordkeeping regulations under Florida law, and as needed to establish, exercise, or defend legal claims. Once the retention period expires, data is securely deleted, de-identified, or permanently anonymized.

4. Third-Party Sharing and Disclosures

We share categories of Personal Data only in specific ways to facilitate your elective wellness program:

- **With Partner Providers and Pharmacies:** Contact details, demographic info, clinical records, and prescription data are shared with our partner clinical Providers and compounding pharmacies in the Pharmacy Network to facilitate evaluations and compound/fulfill your wellness prescriptions.

- **With Service Partners:** We share data with contracted business partners who perform core infrastructure services, including secure cloud hosting, customer relationship management (CRM) database management, identity authentication (e.g., Auth0), billing and payment processing, and security monitoring. These partners are bound by strict confidentiality covenants.
 - **No Sale or Rental of Data:** The Company does not share, sell, rent, or trade your identifiable Personal Information with third parties for their promotional or marketing purposes.
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5. Managing Cookies and Targeted Advertising

We and our advertising partners use tracking technologies ("Trackers") such as cookies and pixel tags to customize your platform experience, analyze portal traffic, and deliver interest-based advertisements.

- **Opt-Out Mechanisms:** You have the right to opt out of the processing of your Personal Data for targeted advertising or "sharing". You may exercise this right by:
 - Utilizing the Cookie Consent Settings available on our website banner;
 - Clicking the "Do Not Sell or Share My Personal Information" link in our website footer;
 - Enabling the Global Privacy Control (GPC) signal on a supported web browser or extension, which we honor automatically in accordance with applicable state laws.
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6. Your State-Specific Privacy Rights

If you are a resident of California or other covered states (including Colorado, Connecticut, Indiana, Maryland, Texas, and Virginia), you possess specific consumer privacy rights under applicable state laws (e.g., the CCPA/CPRA):

- **Right to Know and Access:** The right to request disclosure of the specific pieces and categories of Personal Information we maintain about you, the sources collected from, and the third parties shared with.
- **Right to Delete:** The right to request erasure of your Personal Data, subject to regulatory clinical record retention mandates.
- **Right to Correct:** The right to request the correction of inaccurate or incomplete records.
- **Right to Limit Use of Sensitive Data:** The right to restrict the processing of Sensitive Personal Information to statutorily authorized purposes.
- **Right to Non-Discrimination:** The right to exercise your privacy rights without fear of retaliatory pricing, suspension, or denial of Services.

To exercise any of these rights, please submit a verifiable request to contact@cellbeautyhealth.com *or call us at (754) 216-3572*.

7. GDPR Compliance and International Data Rights

While the Service is primarily directed toward residents of the United States, the Company makes good-faith efforts to respect international data protection standards and comply with the General Data Protection Regulation (GDPR) and similar international data privacy frameworks where applicable.

- **GDPR-Level Privacy Rights:** To the extent you are a resident of the European Union, European Economic Area (EEA), or a jurisdiction with similar regulations, you may possess the following data protection rights, which you can exercise by submitting a request to contact@cellbeautyhealth.com *or by phone at (754) 216-3572*:
 - **Right of Access and Portability:** You have the right to request and receive a copy of your Personal Data on record in a structured, commonly used, and machine-readable format.
 - **Right to Erasure (Right to be Forgotten):** You have the right to request that your Personal Data be permanently erased or deleted from our active systems, subject to applicable clinical record retention requirements under federal and state law.
 - **Right to Rectification:** You have the right to request that any inaccurate or incomplete Personal Data we maintain about you be corrected or completed.
 - **Right to Restrict or Object to Processing:** You have the right to restrict or object to the processing of your Personal Data for specific purposes, such as profiling, direct marketing, or automated decision-making.
 - **Right to Withdraw Consent:** Where our processing is based on your consent, you have the right to withdraw that consent at any time, which we will honor prospectively.
 - **Data Protection Contact:** For any inquiries or requests regarding data privacy or to contact our Data Protection Officer, please contact contact@cellbeautyhealth.com *or by phone at (754) 216-3572*.
 - **International Data Transfers:** If you access the Platform or Services from outside the United States, you acknowledge and agree that your Personal Data will be transferred to, stored, and processed in the United States, where our secure servers are located.
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8. Children's Privacy

The Platform and Services are intended exclusively for individuals aged 18 and over. We do not knowingly collect or maintain Personal Information from minors under 18. If we discover that we have inadvertently collected data from an individual under 18, we will take immediate steps to delete that information permanently from our servers. If you believe we have collected

information on a minor under 18, please contact us immediately at contact@cellbeautyhealth.com *or call (754) 216-3572*.

9. Dispute Resolution

All disputes, claims, or controversies arising out of or relating to this Privacy Policy, including the collection, use, disclosure, or handling of your Personal Data, are governed exclusively by the dispute resolution provisions of the Cell Beauty Terms of Use, which contain a binding individual arbitration provision, a jury trial waiver, a class action and representative action waiver, an informal resolution requirement, and a 30-day arbitration opt-out right. All disputes shall be resolved exclusively through final and binding individual arbitration in Broward County, Florida.

10. Contact Us

If you have any questions or would like further information about this policy, please contact us at: Cell Beauty Health 111 SW 6th St., Fort Lauderdale, Florida 33301 Email: contact@cellbeautyhealth.com | *Phone: (754) 216-3572*