

Privacy policy

This Privacy Policy Statement (hereinafter – the Regulation) is an official document of Telewellness Healthtrust Consortium, operated by TELEWELLNESS Ltd, located at 52 Fitzroy Road , London, NW1 8UA (hereinafter – the “Company” / “Operator”), operating under the trademark “LifetimeAward” and “Telewellness” “HealthClub” and “HealthTrust”. . and determines the procedure for processing and protecting information about individuals (hereinafter referred to as Users) using the services, information, services, programs and products located on the websites www.healthtrust.online and www.lifetimeaward.org and www.lifetimeaward.live (hereinafter the Sites).

We respect your concerns about privacy. This Privacy Policy describes the types of personal information we collect about individuals through our website and mobile apps (collectively, the “Services”), how we may use the information, with whom we may share it, and the choices available regarding our use of the information. The Privacy Policy also describes the measures we take to safeguard the personal information, how long we retain it and how individuals can contact us about our privacy practices and to exercise their rights.

- Deletion: You have the right to request that we delete certain personal information we have collected from you.
- Opt-Out of Sale: You have the right to opt-out of the sale of your personal information.
- Shine the Light Request: You also may have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties.

Verifying Requests: To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you have an account with us, we verify your identity by requiring you to sign in to your account.

California Consumer Privacy Statement

It applies solely to California consumers and addresses personal information we collect online and offline. This Statement does not apply to Telewellness personnel.

This California Consumer Privacy Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

1. Notice of Collection and Use of Personal Information

We may collect the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, passport number, and other similar identifiers

Additional Data Subject to Cal. Civ. Code § 1798.80: signature, state identification card number, education, bank account number, credit card number, debit card number, and other financial information, and medical information

Protected Classifications: characteristics of protected classifications under California or federal law, such as race, national origin, age, sex, gender, gender identity, marital status, medical condition, disability, citizenship status, and military and veteran status

- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies

Online Activity: Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements

Geolocation Data

- **Sensory Information:** audio, electronic, visual and similar information
- **Employment Information:** professional or employment-related information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We have developed Privacy Policy that describes how we process personal data – any actions (operations) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Relations associated with the processing of personal data and information about users of the Site are governed by this Regulation, other official documents of the Operator and the current legislation of the EU and USA

The processing of personal data is carried out by us on a legal and fair basis, acting reasonably and in good faith and on the basis of principles:

- the legality of the purposes and methods of processing personal data; – good faith; – compliance of the purposes of processing personal data with the goals previously determined and declared during the collection of personal data, as well as the powers of the Company; – compliance of the volume and nature of the processed personal data, methods of processing personal data with the purposes of processing personal data

This Privacy Policy governs any type of processing of personal data and personal information (any personally identifiable information and any other information related to it) about individuals who are consumers of the Company's products or services.

This Policy applies to the processing of personal, personal data collected by any means, both active and passive, both through the Internet and without using it, from persons located anywhere in the world.

II. Personal data collection

The purpose of processing personal data is to fulfill the obligations of the Operator to Users regarding the use of the Site and its services.

We may request your personal data at any time when you contact the Company. The company may use such data in accordance with this Privacy Policy. It can also combine such information with other information for the purpose of providing and improving its products, services, content (content) and communications.

The following are some examples of the types of personal data that the Company may collect, and how we may use such information.

We may collect various data / information, including:

- first and last name,
- phone number; – E-mail address;
- information on age, weight and other obvious indicators;

B – information on bank cards (name of card holder, abbreviated card number).

Personal data may also include additional information provided by Users at the request of the Operator in order to fulfill the Operator's obligations to Users arising from the contract for the provision of services. The Operator has

the right, in particular, to request from the User a copy of an identity document or other document containing the name, surname, photograph of the User, as well as other additional data that, at the Operator's discretion, will be necessary and sufficient to identify such User and will allow exclude abuses and violations of the rights of third parties.

When you involve other persons in our events and activities or invite them to communicate with us, the Company may collect the personal data you provide about these persons, such as: name, surname, email address and phone number.

When processing personal data, we ensure the accuracy of personal data, their adequacy, and, if necessary, relevance in relation to the purposes of processing personal data.

If we combine information that is not personal with personal information, such aggregate information will be considered as personal information, so long as such information is combined.

In addition, we will use your contact information to send you Health Newsletters, emails, push notifications and in-app notifications about our products, services, sales and special offers if you sign up to receive them and have not opted out.

We may combine information we obtain about you through our websites with the information obtained through our apps for the purposes described above. We also may use the information we obtain in other ways for which we provide specific notice at the time of collection or otherwise with your consent.

If you do not have an account with us and you request access to or deletion of your personal information, there is no reasonable method by which we can verify your identity to the level of certainty required by the CCPA and GDPR.

Automated Collection Of Data

When you use our Services or open our emails, we may obtain certain information by automated means, such as browser cookies, Flash cookies, web beacons, device identifiers, server logs and other technologies. The information we obtain in this manner may include your device IP address, domain name, identifiers associated with your devices, device and operating system type and characteristics, web browser characteristics, language preferences, clickstream data, your interactions with our Services (such as the web pages you visit, links you click and features you use), the pages that led or referred you to our Services, dates and times of access to our Services, and

other information about your use of our Services. We also may receive your device's geolocation and other information related to your location through GPS, Bluetooth, WiFi signals and other technologies for certain purposes listed above, such as to provide you with our Services. Your device may provide you with a notification when the Services attempt to collect your precise geolocation.

A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "Flash cookie," also known as a local shared object, functions like a web cookie to personalize a user's experience on sites that use Adobe Flash Player. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. We and our third-party service providers may use beacons in emails to help us track response rates, identify when our emails are accessed or forwarded, and for other purposes listed above.

To the extent required by applicable law, we will obtain your consent before placing cookies or similar technologies on your computer. You can stop certain types of cookies from being downloaded on your computer by selecting the appropriate settings on your web browser. Most web browsers will tell you how to stop accepting new browser cookies, how to be notified when you receive a new browser cookie and how to disable existing cookies. You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting www.allaboutcookies.org. [Flash cookies typically cannot be controlled, deleted or disabled through your browser settings and instead must be managed through your Adobe Flash Player settings. To manage Flash cookies, which we may use on our website from time to time, you can go to the Adobe Flash Player Support page available [here](#). In addition, your mobile device settings may allow you to prohibit mobile app platforms (such as Apple and Google) from sharing certain information obtained by automated means with app developers and operators such as us. Our Services are not designed to respond to "do not track" signals received from browsers. Please note that without cookies or other automated tools we use to collect this type of data, you may not be able to use all the features of our Services.

The following types of cookies and similar technologies may be used on the Services:

Internal Cookies Essential For The Services To Function

We use first-party cookies to help enable the Services to function, including to (1) keep track of preferences you specify while you use the Services, (2) access your information when you log into the Services to provide you with

customized content and (3) manage the security of the Services and (4) authorization purposes.

Third-Party Web Analytics Cookies

Through our Services, we may obtain personal information about your online activities over time and across third-party apps, websites, devices and other online services. On our Services, we use third-party online analytics services, such as those of Google Analytics, Upviral and Segment.com. The service providers that administer these analytics services use automated technologies to collect data (such as email address, IP addresses, cookies and other device identifiers) to evaluate, for example, use of our Services and to diagnose technical issues. To learn more about Google Analytics, please visit www.google.com/analytics/learn/privacy.html.

In addition, our apps use Segment's analytics Kit, a third-party app analytics tool integrated into the code of our apps. We use this tool in a way that only analytics data is captured. The information collected includes technical information about your mobile device and aggregated app usage data, such as your device IP address, operating system version, device type and model, app usage length, touch gestures performed in the app, gesture responsiveness and gesture start and end times. This information is hosted by Segment and shared with us for analytics purposes. We use this information solely for those purposes in order to understand how you use our apps and improve our app functionality.

Internal and Third-Party Advertising Cookies

Through our Services, both we and certain third parties may collect information about your online activities to provide you with advertising about products and services tailored to your individual interests. You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to users considering demographic data, users' inferred interests and browsing context. These networks track users' online activities over time by collecting information through automated means, including through the use of browser cookies, web beacons, device identifiers, server logs, web beacons and other similar technologies. The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites and apps, and to build a profile of users' online browsing and app usage activities. The information our ad networks may collect includes data about users' visits to websites and apps that participate in the relevant ad networks, such as the pages or ads viewed and the actions taken on the websites or apps. This data collection takes place both on our Services

and on third-party websites and apps that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

To learn how to opt out of ad network interest-based advertising in the U.S., please visit www.aboutads.info/choices and <http://www.networkadvertising.org/choices/>. In the European Union, please visit www.youronlinechoices.eu.

Third-Party Cookies Intended To Improve The Interactivity Of The Services

Our Services also support certain third-party services, including social sharing buttons (such as Facebook, Google , Instagram, and Twitter), Tweet lists from Twitter and videos posted on the Services from YouTube, likes and shares in Facebook. These features use third-party cookies that are placed directly on your device by these services. The privacy practices of these third parties, including details on the information they may collect about you, are subject to the privacy notices of these parties, which we strongly suggest you review. Telewellness is not responsible for these third parties' information practices that You can find on www.segment.com and www.upviral.com

Information Sharing

We do not disclose personal information we obtain about you, except as described in this Privacy Policy. We will share your personal information with our (1) subsidiaries and affiliates, and (2) third-party service providers who perform services on our behalf (such as payment processing and authorization, order fulfillment, transportation, customs clearance, marketing, data analytics, customer support and fraud prevention) for the purposes described in this Privacy Policy. We do not authorize our service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may disclose information about you: (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; (6) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); or (7) otherwise with your consent.

Data Transfers

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries, we will protect that information as described in this Privacy Policy and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries other than the one in which you provided the information.

If you are located in the European Economic Area (“EEA”), United Kingdom (“UK”) or Switzerland, with respect to transfers of personal information to the United Kingdom. (“Telewellness LTD”) is in accordance to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks developed by the U.S. Department of Commerce, and the European Commission and Swiss Federal Data Protection and Information Commissioner

The personal data of Users is stored exclusively on electronic media of certified partners Godaddy, Upviral, Segment, Amazon and processed using automated systems, unless the automated processing of personal data is necessary in connection with the implementation of legal requirements.

HOW WE USE YOUR PERSONAL INFORMATION

The personal data we collect allows you to send you notifications about new products and services of the Company and partners, special offers and various events. They also help us improve our services, content and communications. If you do not want to be included in our mailing list, you can unsubscribe at any time by informing us of the indicated contacts for feedback, as well as making changes to your profile settings on the site. From time to time, we may use your personal data to send important notifications containing information about changes to our terms, conditions and policies. Since such information is important for your relationship with the Company, you cannot refuse to receive such messages.

We can also use personal information for internal purposes, such as: conducting an audit, analyzing data and various studies in order to improve the Company’s products and services, as well as interacting with users.

COLLECTION AND USE OF INFORMATION NOT PERSONAL

We also collect personal data that is not personal – data that does not directly associate it with any particular person. We may collect, use, transmit and disclose non-personal information for any purpose. The following are examples of non-personal information that we collect and how we can use it: We can collect personal data, such as: information about occupation, language, zip code, unique identifier of the device, location and time zone in

which this or that product is used, in order to better understand consumer behavior and improve our products, services and communications.

We may also collect personal data / information about what the user is interested in on our website when using our other products and services. Such personal data / information is collected and used to help us provide more useful information to our customers and to understand which elements of our site, products and services are most interesting. For the purposes of this Privacy Policy, aggregate data is treated as data / information that is not personal.

1. Transfer of personal data

The personal data of the Users are not transferred to any third parties, with the exception of cases expressly provided for by these Regulation. The processing of the User's personal data is carried out without any time limit, in any legal way, including in personal data information systems using automation tools or without using such tools. The User agrees that the Operator has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunication operators, etc., solely for the purposes specified in the "Personal Data Collection" section of this Privacy Policy

2. If the user specifies or with the consent of the user, it is possible to transfer the User's personal data to third parties-counterparties of the Operator subject to the assumption by such counterparties of obligations to ensure the confidentiality of information received, in particular when using applications.

3. Applications used by Users on the Site are hosted and supported by third parties (processors/operators) who act independently of the Operator and do not speak on behalf or on behalf of the Operator. Users are required to independently familiarize themselves with the rules for the provision of services and the privacy policy of such third parties (developers) before using the relevant applications.

The User's personal data can be transferred at the request of authorized bodies of state power..

The Operator blocks personal data related to the relevant User from the moment of requesting the User or his legal representative or authorized body for the protection of the rights of personal data subjects for the period of verification, in case of revealing inaccurate personal data or illegal actions.

DISCLOSURE TO THIRD PARTIES

The Company may provide certain personal information in anonymized form. You can find Privacy policies of the third parties, in the respectively sections on

www.segment.com and www.upviral.com and www.sendpulse.com

Requests in connection to this Privacy Policy send to [ed @healthtrust.online](mailto:ed@healthtrust.online)