

PRIVACY POLICY

Effective date: 01.05.2023

OptimuMedicine, LLC, Optimum A.I.R., LLC, and its affiliated companies and subsidiaries (collectively “OptimuMedicine,” “OM,” “we,” “us”), are committed to protecting the privacy and security of your information. This Privacy Policy describes how we use, disclose, and otherwise process the Personal Information (as defined below) we collect about you when you:

- Visit our main website (Optimumedicine.com), its subdomains, and all other websites, products, and services that OptimuMedicine owns or controls and link to this Privacy Policy (collectively, the “Sites”);
- Communicate with us by email, telephone, mail, or facsimile or interact with us in person;
- Sign up for one of our classes;
- Sign up to receive email, mail, or other communications from us;
- When you interact with our advertising and applications on third-party websites and services;
- Apply for a job at OptimuMedicine; or
- Otherwise provide Personal Information to us, whether offline or online, in the context of our relationship with you.

This Privacy Policy is in addition to, and does not replace OptimuMedicine, LLC’s HIPAA Notice of Privacy Practices, which explains how we use and disclose our patients’ Protected Health Information (“PHI”) and your rights to access and amend your PHI under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). In the event of a conflict between the terms of this Privacy Practices will control. We refer to the Sites, products, services, and interactions with you collectively as “Services” in this Privacy Policy. From time to time, we may supplement this Privacy Policy with additional information about our privacy practices related to a particular Service we perform. Please read this Privacy Policy carefully before using the Services or submitting your information to us.

The Personal Information We Collect

“Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household.

When you interact with the Services, we may collect certain Personal Information directly from you or automatically from the devices you use to access our Services. Depending on how you use the Services, we may collect the following types of information from or about you and/or your household. Please note that if we collect information through your use of the Services that is PHI regulated by HIPAA, then we may use, disclose, and process your PHI in accordance with our HIPAA Notice of Privacy Practices.

- *Identifiers* – your name, address, email address, date of birth, phone number, and contact information, login name and password.
- *Internet or other electronic network activity information* – information we automatically receive about the devices you use to access the Sites, your IP address, the type of Internet browser used to visit the Sites, the areas of Sites you visited and the other actions you performed on the Sites, and information we collect using cookies and other tracking technologies as described in the “Cookies and Other Data Collection Technologies” section, below.
- *Professional or employment-related information* – your resume, curriculum vitae (“CV”), employment history, educational history, references, qualifications, and demographic information you voluntarily provide to us.
- *Commercial information* – your payment method and payment card information.
- *Inferences* – which we may draw from the information we collect about you to create a profile about you reflecting your preferences, such as your interest in our Services.
- *Sensitive Personal Information* – your health information, log-in name and password used to access your user account on the Services or truncated Social Security Number.
- *Other information you may choose to provide* – for example, when you contact our billing services, pay our bill, sign up for classes, send us comments or questions, or otherwise communicate with us.

How We Collect Your Personal Information

Depending on how you use our Services, we may collect Personal Information from you in the following ways:

- *Directly from you.* We may collect Personal Information from you directly through your use of the Services.
- *Through automated data collection technologies.* We may collect your Personal Information using automated data collection technologies as described in the “Cookies and Other Data Collection Technologies” section, below.

- From third parties. We may obtain your information through third-party sources, such as our business partners, marketing partners, and services providers. We may combine this information with the information we collect about you to help us tailor our communications and improve our Services.

How We Use Your Personal Information

We may use Personal Information as outlined below:

- *Provide you with the Services.* We may use your Personal Information to provide you with the Services, process your job applications, process your transactions, respond to your questions and comments, and send you communications about the Services.
- *Build and maintain our relationship with you.* We may use your Personal Information to improve your experience with our Services, send you marketing messages about the Services that may be of interest to you, and send you informational newsletters. We may also draw inferences from the Personal Information you provide to us, such as information about your preferences, characteristics, and interest in our Services.
- *Improve the Sites and our Service offerings.* We may use your Personal Information to understand who is visiting the Sites and using the Services, perform market research and analysis, analyze how the Sites are being used and accessed, improve the functionality of the Sites and your user experience, conduct quality assurance activities, perform internal business reviews, and develop new Services.
- *Maintain the security of the Sites.* We may use your Personal Information to maintain the security and integrity of the Sites, detect security incidents, protect the Sites against fraudulent and illegal activity, and enforce our terms of use.
- *Comply with our legal obligations and respond to legal proceedings.* We may use your Personal Information to comply with our legal obligations, including maintain records of our compliance with federal and state law requirements, responding to a civil, criminal or regulatory inquiry or investigation, and to cooperate with law enforcement and other government agencies. We may also use your Personal Information to establish, exercise or defend legal claims.

How We Disclose Your Personal Information

We may disclose your Personal Information as outlined below:

- *With our affiliates and subsidiaries.* We may disclose your Personal Information to our affiliates and subsidiaries for use in accordance with this Privacy Policy.
- *With our service providers.* We may disclose your Personal Information with service providers and vendors that perform tasks on our behalf, such as invoicing or billing activities, marketing and analytics activities, payment processing, the operation and maintenances of the Sites, and other services. Any such service providers will be under an obligation to us to maintain the confidentiality of your Personal Information.
- *Public and governmental authorities.* We may disclose your Personal Information with entities that regulate or have jurisdiction over OptimuMedicine, such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- *Other third parties, as reasonably necessary.* We may disclose your Personal Information with other third-parties:
 - in relation to a merger, sale, acquisition, divestiture, restricting, reorganization, dissolution, bankruptcy, or other change of ownership or control (whether in whole or in part);
 - to perform functions on our behalf and who also provide services to us, such as professional advisors, social media networks, data management companies, digital agencies and marketers;
 - to (1) comply with laws applicable to OptimuMedicine, a request from law enforcement, a request from a regulatory agency, or other legal process; (2) protect the rights, privacy, property, interests or safety of OptimuMedicine, our customers, business partners, personnel, or the general public; (3) pursue available remedies or limit damages; (4) enforce our terms of use; or (5) respond to an emergency;
 - to comply with your request; or
 - to comply with your request or with your consent.

Retention of Personal Information

As a general matter, we may retain your Personal Information for as long as it is necessary to fulfill the purposes for which we collected it, to satisfy legal and regulatory requirements, or as required or permitted by applicable law. To determine the length of time for which we will retain personal Information, we may consider the volume and sensitivity of the Personal Information, the purposes for which we collect and use the Personal Information, and applicable legal and regulatory requirements. In certain circumstances, we may anonymize your Personal Information so that it can no longer be associated with you. We may use such anonymized information for various business purposes, including analytics and research, and may retain it indefinitely without further notice to you.



Cookies and Other Tracking Technologies

Our Sites use cookies and associated tracking technologies. A “cookie” is a small text file that is placed on your computer or mobile device when you enter a website or a mobile application (“app”). It enables the website or mobile app to remember your actions and preferences over a period of time. In addition, our Sites may use other technologies such as web beacons (also called a “pixel tag” or “clear GIF”) in combinations with cookies to help OptimuMedicine identify and track usage of the Sites in order to gather aggregate data related to their usage and usability. While the cookies we use may change from time to time, they generally fall into one of the following categories:

- *Strictly necessary cookies.* These cookies are strictly necessary in order for you to use the services, load and view content, and access your account.
- *Functionality cookies.* These cookies help us remember you and personalize features and content for you on the services.
- *Preference cookies.* These cookies allow us to capture and store your information privacy related preferences (e.g., your opt-in and opt-out), account settings, and certain login information.
- *Analytics cookies.* These cookies help us and our services providers compile statistics and analytics about platform users, including traffic, usage, demographic, and trend data, which will enable us to understand how users engage with our Sites.
- *Advertising cookies.* These cookies will display advertising on our website and on third-party websites. Some of these advertisements may be interest-based, meaning that they are tailored to your interests or behaviors on our website or on other websites. These cookies track visitors across websites and collect information to do things like:
 - (1) Understand and save your preferences for future visits, allowing us to customize the Sites and Services to your individual needs;
 - (2) Advertise new content and services that relate to your interests;
 - (3) Keep track of advertisements and search engine results;
 - (4) Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
 - (5) Recognize when you return to the Sites.

We may allow third parties to serve advertisements on our behalf across the Internet and to provide analytic services. Please note these third parties are not controlled by us and any Personal Information shared with them is subject to the applicable third party’s privacy policy. We encourage you to review the privacy policies of any supplier whose products or services you purchase through this Website. The third-party service providers we may use for advertising and analytics include, but are not limited to Google (Alphabet, Inc.), Bing, Facebook and Instagram (Meta).

- For more information about Google’s data collection practices, please reference Google’s [Privacy Policy](#).
- For more information about Bing’s data collection practices, please reference Bing’s [Privacy Policy](#).
- For more information about Facebook and Instagram’s data collection practices (Meta), please reference their [Privacy Policy](#).

We may collect technical information from and about your device (such as your browser type, operating system, IP address, and domain name) via cookies and other tracking technologies, but we never use cookies to access information on your computer or device. You can choose whether to accept cookies, you may still enter the Sites, but you may not have full access to all areas within the Sites. To learn more about cookies, please visit <https://allaboutcookies.org/>.

Opting Out of Cookies

Our Sites use cookies to personalize your experience. Cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyze and understand how you use this website. These cookies will be stored in your browser only with your consent. Under certain state laws, collection of data through third-party cookies for targeted advertising and similar purposes may be considered a “sale”; if you wish to opt out of such a “sale” of your personal information, please refer to the section below entitled “Contact Us” for instructions on how to opt out.

Cookies can also be blocked by changing your internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Sites. Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

Notice to Nevada Residents



If you are a Nevada resident, you have the right to opt out of the sale of Personal Information, including your name and mailing address, to third parties. OptimuMedicine does not sell your personal information. If that were to change in the future, we will provide Nevada residents with a method to opt-out of those transactions.

Use and Disclosure of Personal Information

Generally, in the past twelve (12) months we have collected the categories of Personal Information detailed in the “What Personal We Collect” section, above, from the sources described in the “How We Collect Your Personal Information” section, above. We have used and disclosed Personal Information for the purposes described, respectively, in the “How We Use Your Personal Information” and “How We disclose Your Personal Information” sections, above. We do not collect or process Sensitive Personal Information to infer characteristics about you.

Although we have not "sold" Personal Information for money in the past twelve (12) months, we engage in standard business interactions with third parties that might be considered a “sale” of Personal Information.

Specifically, we allow third parties to control the collection of Personal Information through cookies and other tracking technologies. These third parties use the data to allow us to understand how the Sites are used, to understand your preferences and interests, and to customize advertisements to those interests and preferences. For more information on our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section, above. We do not knowingly sell or disclose personal information of minors under the age of 16.

Security of Your Personal Information

We take reasonable steps to protect the security of your Personal Information. Please understand, however, that no data transmitted over the Internet can be guaranteed to be 100% secure. Accordingly, please be thoughtful about what information you send through the Sites.

Do Not Track

Some web browsers incorporate a “Do Not Track” or similar feature that signals to websites that a user does not want to have their online activity and behavior tracked. We are committed to providing you with meaningful choices about the information collected through the Sites. However, like many websites, our Sites are not currently designed to recognize a “Do Not Track” signal from a web browser.

Third-Party Websites

Please be aware that you may be directed to third-party websites for services accessed through one of our Sites. Linked websites are not under our control and these websites may collect Personal Information about you. You are encouraged to review the privacy policy for each third-party website that may collect your Personal Information.

Children’s Privacy

The Sites are not intended for children under 16 years of age. We do not knowingly collect the Personal Information of children under 16 years of age through the Sites without the authorization of a responsible adult (e.g., a parent or legal guardian).

Changes to this Privacy Policy

OptimuMedicine may modify this Privacy Policy at any time in its discretion to reflect, for example, changes to our practices or for other legal, regulatory, or operational reasons. If we make any material changes to the ways in which we process your Personal Information, then we will take reasonable efforts to notify you of these changes. The updated Privacy Policy will supersede all previous versions. Your continued use of the Services after the effective date of the updated Privacy Policy will indicate your acceptance of the updated Privacy Policy.

Opt-Out

For residents of Nevada, in order to exercise the Right to Opt Out of Targeted Advertising, you must undertake both of the following steps:

1. Submit a request to inquire@optimumedicine.com.
2. Disable the use of all cookies and other tracking technologies by changing your Internet browser settings to refuse all or some cookies.



With any request, we may take steps to verify your identity before processing your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected Personal Information. We will only use the Personal Information provided in the verification process to verify your identity or authority to make a request and to track and document your requests and our responses, unless you initially provided the information for another purpose. You may use an authorized agent to submit a request. When we verify your agent's request, we may verify your identity and request a signed document from your agent that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that you have authorized them to act on your behalf.

Contact Us

We welcome your questions and comments about this Privacy Policy or how we process your Personal Information. You may contact us using the information below.

By email: inquire@optimummedicine.com

By phone: 702-302-4569