WELLSTART PRIVACY POLICY

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A printable version of this Privacy Policy is available at https://www.wellstart.com/privacy-policy.

Wellstart Medical LLC ("Wellstart," "we," "us," or "our") is committed to protecting the privacy and security of the information entrusted to us. This Privacy Policy explains how we collect, use, disclose, and safeguard personal information when you interact with our websites and online services that link to this policy (collectively, the "Services").

1. Scope and Relationship to HIPAA

This Privacy Policy applies to personal information collected through our website, advertising landing pages, marketing communications, and other online interactions that reference this policy. "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 a particular individual or household. Personal information does not include publicly available information, lawfully available information from federal, state, or local government records, or information that has been de-identified or aggregated in accordance with applicable law.

This Privacy Policy does not apply to:

- Protected health information ("PHI") that we collect, use, or disclose in connection with providing medical supplies, coordinating with healthcare providers, billing insurance, or for other lawful purposes. PHI may include identifiers such as IP addresses, device identifiers, cookie identifiers, and other online identifiers collected through tracking technologies when that information is combined with data indicating that an identifiable individual has submitted an eligibility inquiry, placed an order, or otherwise made an identifiable request for our medical supplies or services, is communicating with us regarding a specific health condition, or is accessing an authenticated patient portal, account, or other password-protected page in connection with their care; records of the specific medical supplies, equipment, or services you have purchased, considered, or been billed for, and your associated order and transaction history; and recordings of your communications with our customer service representatives to the extent they contain information about your health condition, symptoms, diagnosis, treatment, or medical equipment needs. PHI is governed by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and is described in our separate Notice of Privacy Practices available here: https://www.wellstart.com/notice-of-privacy-practices.
- Any specific contracts or relationships that may be governed by further privacy agreements. If you are engaging with us on behalf of an organization, your employer, or are otherwise providing the personal information of others, by engaging with us, you acknowledge and agree that you have the consent of the organization, your employer, or

the other individual to provide that personal information to Wellstart. Please note that the organization (e.g., your employer or another entity or person) that entered into the contract or relationship with us controls the content submitted through the Services and any associated personal information.

2. Information We Collect

We may collect the following personal information (not including PHI as described in Section 1 above) directly from you, from third parties, and automatically through your interaction with our Services:

- **Geolocation information,** such as IP address.
- **Internet or electronic network activity information,** including certain technical and usage information. This may include your IP address, browser type, device information, operating system, approximate location derived from IP address, referring URLs, and information about how you interact with our website, including pages visited and time spent on those pages. We use cookies and similar technologies to support website functionality, analytics, security, and advertising. Additional information about cookies is provided in Section 3 below.
- **Professional or employment-related information**, such as job title, employer name, and employer email address.
- **Inferences drawn from the above**, including information derived from other personal information that is used to create a profile reflecting your preferences, characteristics, or behavior. This information may be considered sensitive personal information under certain U.S. state laws.

Children's Personal Information

The Services are not directed to children under 18 years of age, and we do not knowingly collect personal information from children under 18. If you are under 18, please do not use the Services or provide any personal information to us. If we learn that we have collected personal information from a child under the age of 18 we will promptly delete that information. We do not sell or share the personal information of a child under 18 years of age unless we receive appropriate authorization as required by applicable law.

3. Cookies and Similar Online Tracking Technologies

We, and third parties acting on our behalf, may use cookies, software development kits, web beacons, pixels, or similar online tracking technologies (collectively, "cookies") to improve your experience on the Services, such as remembering you when you return to the Services, track interest in and collect aggregate information on the Services, and analyze traffic patterns on the Services and the performance of our advertising and marketing. We may also work with service providers that use cookies to collect information about your visits to the Services and to other websites you may visit, and to serve advertisements to you across the Internet based on that information.

How long these cookies stay on your device depends on what they need to do. For example, some cookies only work while you are visiting our Services and get deleted when you're done (session cookies). Others may stay on your device unless you choose to delete them (persistent cookies). Cookies may be placed by us (first-party cookies) or by other businesses (third-party cookies) when you visit our Services or other online properties.

We may use session replay and heatmap technology to understand how users interact with our websites. These tools capture information such as mouse movements, clicks, scrolling, and page interactions, and may record the content of your interactions on sensitive portions of the Services. Information collected through these tools may be shared with the technology providers for product improvement purposes, which may constitute a "sale" or "sharing" under applicable laws.

The cookies used on our Services can be classified using the International Chamber of Commerce guide for cookie categories: Strictly Necessary, Performance, Functional, and Targeting. We may use the following cookies:

- **Strictly necessary cookies:** These are cookies that are required for the operation of our Services. They include, for example, cookies that enable you to log into secure areas of our Services or areas requiring your acknowledgment or consent to proceed.
- **Performance/Analytics cookies:** These cookies from third-party services allow us to recognize and count the number of visitors and to see how visitors move around our Services when they are using them. This helps us improve the way our Services work, for example, by ensuring that users find what they are looking for easily. We use analytics tools, including Google Analytics, to understand aggregate user behavior and improve our Services.
- **Functional cookies:** These are used to recognize you when you return to our Services. These enable us to personalize our content for you or remember your preferences (for example, your choice of language or region).
- **Advertising and Remarketing** We may use advertising platforms such as Google Ads, Meta, and similar tools to measure the effectiveness of our advertising campaigns and to display advertisements to individuals who have previously visited our website. These technologies may collect identifiers such as cookie IDs, device information, IP address, and website interaction data. Under certain state privacy laws, disclosure of identifiers for cross-context behavioral advertising may be considered "sharing" or a "sale" of personal information. You can manage certain cookie and tracking preferences through your browser settings or our cookie preference tools, where available.

Your Cookie Choices

- **Browser Settings:** You may be able to block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Check your browser's HELP menu to learn the correct way to change or update your cookies. You can also visit www.aboutcookies.org, which contains more information on how to do this on many different browsers. Please see your mobile phone's instructions for information on how to do this on your phone's browser. Please note that if you use your browser

settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our Services.

- **Advertising Cookie Opt-Out:** In the United States, you may opt out of companies participating in the Digital Advertising Alliance ("DAA") program by opting out at https://optout.aboutads.info. For information and to download DAA's AppChoices tool, see https://youradchoices.com/appchoices. Note that opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver ads tailored to your preferences and usage patterns.
- **Google Analytics:** To help facilitate the delivery of relevant content, we use Google Analytics and have implemented all Google Advertising Features, including Remarketing, Impression Reporting, and Demographics, and Interest Reporting. Google Analytics uses cookies to report on user interactions on our and others' websites. We use the data collected for optimizing marketing, refining advertising and/or programming strategies, and generally making advertising more effective. Google provides a complete privacy policy here: http://www.google.com/intl/en/analytics/privacyoverview.html and instructions on opting out of Google Analytics using a specific plug-in available at the following link: https://tools.google.com/dlpage/gaoptout. Note that this opt out is specific to Google activities and does not affect the activities of other advertising networks or analytics providers that we may use.
- **Meta Pixels**: We use the Meta Pixel to analyze user activity on our Services for remarketing and behavioral targeting. The Meta Pixel is triggered when you perform certain activities on the Services and aids us in displaying ads to users who have visited our Services, or users who share certain characteristics with visitors to our Services. Meta may track your activity over time and across websites. For more information about the personal information Meta collects and choices you may have to control this personal information collection, please visit Meta's privacy policy at: www.facebook.com/privacy/policy.
- **Browser Signals**: The "Do Not Track" ("DNT") privacy preference is an option that may be made in some web browsers. At this time, not all browsers support DNT. We honor opt-out preference signals, such as the Global Privacy Control ("GPC"), as another way to opt out of the "sale" of your personal information or its "sharing" for targeted advertising purposes. More information on the GPC is available here: https://globalprivacycontrol.org. Please note that your choice to opt out using these signals is device- or browser-specific and you will need to manage your preferences for each device or browser you use.

4. How We Use Personal Information

We use personal information to:

- Provide the Services.
- Communicate with you, such as to respond to inquiries and requests; send transactional messages; send marketing communications (subject to your choices) and where permitted by law; and notify you of changes to our Services or policies.

- Personalize the Services, such as customizing content, recommendations, and features based on your interests and interactions.
- Develop new products and services.
- Obtain analytics so we can operate, maintain, and improve our website and Services.
- Measure marketing effectiveness.
- Detect, prevent, and address security or fraud concerns.
- Comply with legal and regulatory requirements; enforce our Terms of Use; and establish, exercise, or defend legal claims.
- Allow corporate transactions in connection with a merger, acquisition, financing, reorganization, bankruptcy, or sale of all or a portion of our assets.
- Any other purposes disclosed at the time of collection or as required or permitted by law.

We may use and share de-identified or aggregated information for any lawful purpose. Where we maintain de-identified information, we take reasonable measures to ensure that the information cannot be associated with a consumer or household, maintain the information in de-identified form, prohibit recipients contractually from attempting re-identification, and otherwise comply with applicable law.

5. How We Disclose Personal Information

We may disclose your personal information to Wellstart employees as required to provide the Services, or to our affiliates or subsidiaries for business purposes consistent with this Privacy Policy.

We may disclose personal information to service providers that perform services on our behalf, including website hosting providers, analytics providers, marketing automation vendors, cloud service providers, IT service providers, and professional advisors, such as accountants, auditors, attorneys, or insurers.

We may disclose certain identifiers and internet activity information to advertising platforms for targeted advertising and measurement purposes.

We may also disclose information when required by law, in response to lawful requests by public authorities, or in connection with a merger, acquisition, or sale of assets.

SMS opt-in data and consent are handled as described in the Communication Preferences section below and are not shared or sold for third-party marketing or promotional purposes.

6. Sale or Sharing of Personal Information

Wellstart does not sell personal information, including sensitive personal information, for monetary compensation. We work with third-party advertising and analytics partners and social media sites, and these arrangements may be considered a “sale” or “sharing” under the California Consumer Privacy Act and similar U.S. state privacy laws, even though no money changes hands. For example, when you visit or interact with our public-facing website or internal pages where third-party cookies are present, the information collected by cookies may be considered a

“sale” or “sharing” of your personal information. For more information about our use of cookies and similar online tracking technologies, please see the “Cookies and Similar Online Tracking Technologies” in Section 3, above.

7. Communication Preferences

If you choose to receive email or text communications, we may send service-related messages such as order updates, account notifications, and reorder reminders.

Marketing communications are sent only where permitted by law.

You may opt out of marketing email communications by using the unsubscribe link in the email. You may opt out of text messages by replying STOP.

We may share SMS-related information with vendors, aggregators, carriers, and service providers that support the delivery, administration, and compliance of our text messaging services. We do not sell, rent, or share your mobile number or SMS consent information with third parties for their marketing or promotional purposes. All other categories of personal information shared with third parties and their affiliates exclude text messaging originator opt-in data and consent. These parties are authorized to use such information only as necessary to provide text messaging services to Wellstart or as required by law. Message frequency may vary. Message and data rates may apply. Calls to or from Wellstart may be recorded or transcribed for quality assurance and training purposes.

8. Your Privacy Rights

Depending on your state of residence and applicable law, you may have rights regarding our collection, use, and disclosure of your personal information. Residents of California and Delaware, and residents of other states with similar privacy laws, may have the following rights, subject to exceptions under applicable law:

- You have the **right to know and right to access information about** the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties or a list of specific third parties with whom we share such information. You also have the right to know if we have sold or shared your personal information.
- You have the **right to obtain a copy of your personal information** in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another entity without hindrance.
- You have the **right to request the deletion** of your personal information, subject to certain exceptions.
- You have the **right to opt out** of the “sale” of your personal information to third parties.
- You have the **right to opt out** of the “sharing” of your personal information with third parties for targeted advertising.
- You have the **right to correct** your personal information if it is inaccurate.

- You have the **right to limit the use and disclosure of your sensitive personal information** if we use such information to infer characteristics about you.
- You have the **right to not be discriminated against or retaliated against** for exercising these rights. We will not deny you goods or services, charge you different prices, provide a different level or quality of goods or services, or suggest that you will receive a different price or level of goods or services because you exercised a privacy right.
- You have the **right to opt out of profiling** where automated decision-making technology ("ADMT") is used to make decisions about you that have a legal or similarly significant effect. Wellstart does not used ADMT to make decisions about you.
- You may also have the **right to question the result of profiling**, be informed of the reason the profiling resulted in a decision, review the personal information used in the profiling, and, where applicable, have the decision reevaluated based on corrected information. Wellstart does not use ADMT to process your personal information in order to profile you.
- You have the **right to request information about our use of ADMT**. Upon submission of a verifiable request, we will provide you with: (a) a plain-language explanation of the specific purpose for which we used ADMT; (b) how the ADMT processes personal information to make the significant decision, including the categories of personal information that affect the output; (c) the type of output generated by the ADMT and how that output is used to make the significant decision; and (d) the outcome of the decision, including any plans for future use of the output in significant decisions concerning you. Wellstart does not used ADMT to process your personal information.

How to Submit a Request

To exercise any of the rights described above, you (or your authorized agent) may submit a request by contacting us at privacy@wellstart.com. We will respond to privacy rights requests as required by applicable law. Where permitted by law, we may limit, charge a reasonable fee for, or decline to act on certain repeat, excessive, manifestly unfounded, or technically infeasible requests.

Authorized Agent

You may, under certain circumstances, authorize another individual or a business, called an Authorized Agent, to make a verifiable consumer privacy request on your behalf. If you wish to have an Authorized Agent make a verifiable consumer privacy request on your behalf, they must provide us with sufficient written proof that you have designated them as your Authorized Agent, and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Verification of Requests

To protect your privacy, we take reasonable steps to verify your identity before responding to a request to know, delete, correct, obtain a copy, or limit the use of sensitive personal information. The verification steps we use depend on the nature of the personal information involved and the risk of harm from unauthorized disclosure. We may ask you to provide information that matches

personal information we already maintain, or to authenticate through your account. We will not use personal information provided for verification for any other purpose except where required by law.

Response Timelines

We will respond to your privacy rights request within the period required by applicable law. In most cases, we will respond within forty-five (45) days after receiving your request. If a different response period applies under applicable law, we will respond within that period. Where permitted by law, we may extend the response period when reasonably necessary, taking into account the complexity and number of requests. If we extend the response period, we will notify you within the initial response period and explain the reason for the extension.

Appeal of Denied Requests

If we deny a request you submit (in whole or in part), we will provide you with a detailed explanation of the basis for the denial. You may appeal our decision by contacting us at privacy@wellstart.com with the subject line "Privacy Rights Appeal," or by calling our toll-free number. Please include: (a) your original request, (b) the denial response, and (c) the reasons you believe the denial was in error. We will respond to your appeal within the period required by applicable law.

Additional States Rights

- **California's "Shine the Light" law.** California Civil Code Section 1798.83 permits visitors to the Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us by emailing us at privacy@wellstart.com and include "Shine the Light Request" in the subject line of your email.
- **Nevada residents.** Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties for monetary consideration. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

9. Residents of Washington State and Nevada – Consumer Health Data Privacy Notice

This notice supplements the information contained in this Privacy Policy and applies solely to visitors, users, and others who reside in the state of Washington or Nevada, with respect to your "consumer health data" as defined under the Washington My Health My Data Act and Nevada Senate Bill 370.

Wellstart's Services may collect, use, process, and share consumer health data, such as the geolocation and internet or electronic network activity information described in Section 2 above, to the extent that information does not constitute PHI as described in Section 1 above. If you are

a Washington or Nevada consumer, you have certain rights with respect to your consumer health data. These rights include:

- **Right to Access.** You have the right to confirm whether our Services are collecting, sharing, or selling your consumer health data, and to access such data, including a list of all third parties and affiliates with whom Wellstart has shared or sold your consumer health data and an active email address or other online mechanism for contacting those third parties.
- **Right to Deletion.** You have the right to request that Wellstart delete your consumer health data, subject to certain exceptions.
- **Right to Withdraw Consent.** You have the right to withdraw your consent for the collection and sharing of your consumer health data.
- **Right to Appeal.** If Wellstart denies your request to exercise any of these rights, you may appeal that decision. If your appeal as a Washington resident is unsuccessful, you may raise a concern or lodge a complaint with the Washington State Attorney General at www.atg.wa.gov/file-complaint.

10. Data Retention

We retain personal information for as long as necessary to fulfill the purposes described in this policy, comply with legal obligations, resolve disputes, and enforce agreements. Retention periods may vary based on the nature of the data and our contractual commitments. If you delete an account you have with us, keep in mind that the deletion may not be immediate and that the deleted information may persist in backup copies within our systems or within those of our third-party providers for a reasonable period.

11. Security

We implement reasonable administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, use, alteration, or disclosure. While we strive to protect personal information, no method of transmission over the Internet or electronic storage system is entirely secure. You are responsible for safeguarding your account credentials and promptly reporting any suspected security incidents. If you feel that the security of any data that we hold about you has been compromised, please immediately notify us at privacy@wellstart.com.

In the event of a data breach involving personal information, we will provide notice as required by applicable law.

12. Disclaimer Regarding Large Language Model Training

We do not use your personal information to train third-party generative artificial intelligence ("AI") models unless you have provided consent or the use is otherwise permitted by law. Where we use a third-party AI provider to process personal information on our behalf, we do so under a written data-processing agreement that restricts the provider's use of personal information to the purposes for which we engaged them.

13. Disclaimer Regarding Video Content

Our Services may contain video content, audiovisual content, or content of a like nature (collectively, "Video Content"). In connection with our provision of Video Content, our Services may utilize cookies that track information about your activity and webpage-viewing history on the website. Cookies on or used by the Services may result in information about your activity on our Services being transmitted from your browser to us and third parties, which, in turn, may result in the display of targeted advertisements on third-party websites, platforms, and services, including advertisements for our content. In addition, whether cookies on the Services result in your browser's transmission of information to third parties depends on a number of factors that may be outside of our knowledge or control, including what third-party services you use, what personal information you have provided to such third parties, and whether (and the extent to which) you have limited the use of cookies by the operators of those third-party websites, platforms, and services.

14. Third-Party Links and Public Posting Areas

Our Services may contain links to third-party websites or services that are not operated by Wellstart. We are not responsible for the privacy practices or content of such third parties. We encourage you to review the privacy policies of any third-party websites you visit.
Please note that any information you include in a message you post to any social media pages, forums, or other public posting areas (collectively, "public posting areas") is available to anyone with Internet access. If you do not want people to know your email address, for example, do not include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN ANY PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF ANY PERSONAL INFORMATION THAT YOU DISCLOSE IN ANY PUBLIC POSTING AREAS.

15. International Data Transfers

The Services are operated primarily in the United States. If you are accessing the Services from outside the United States, please be aware that personal information may be transferred to, stored in, and processed in the United States. By using the Services, you acknowledge that the data-protection laws of the United States may differ from, or be less protective than, those of your country of residence.

16. Changes to This Privacy Policy

We may update this Privacy Policy periodically. When we make material changes, we will revise the "Last Updated" date and provide notice as required by law.

17. Contact Our Privacy Officer

If you have questions regarding this Privacy Policy or our privacy practices, please contact:

Wellstart Medical LLC
9156 S US Highway 1
Port St Lucie, FL 34952
Phone: 800-978-7599
Email: privacy@wellstart.com