Pain 2 Wellness Healthcare Privacy Policy

Last Updated: April 21, 2021

Pain 2 Wellness Healthcare and its subsidiaries ("P2WH Media", "Interventional Pain Program", "Knee Restoration Program", "Reverse It!" "MetaGenics", "Detox Body Line"), respect your concerns about privacy. References in this Privacy Policy to "P2WH", "we", "us", and "our" are references to the P2WH entity responsible for the processing of your personal information, which generally is the P2WH entity that collects your personal information.

This Privacy Policy describes the types of personal information we obtain, how we may use that personal information, with whom we may share it and how you may exercise your rights regarding our processing of that information. The Privacy Policy also describes the measures we take to safeguard the personal information we obtain and how you can contact us about our privacy practices.

This Privacy Policy covers the personal information we collect (1) when providing services through applications and websites that are affiliated with P2WH and that link to this Privacy Policy and (2) in the usual course of P2WH's business, such as in connection with our medical office, events, sales and/or marketing activities (collectively, the "Services").

References to "**P2WH**," may be construed as references to Pain 2 Wellness Healthcare with offices at 235 Portal Lane Madison, AL and its parents, subsidiaries, or divisions, including but not limited to, ("P2WH Media", "Interventional Pain Program", "Knee Restoration Program", "Reverse It!" "MetaGenics", and "Detox Body Line".

We recommend that you read this Privacy Policy in full to ensure you are fully informed. However, to make it easier for you to review those parts of this Privacy Policy which apply to you, we have divided up the document into sections:

1. WHO WE ARE

P2WH is a medical office located in Madison, AL where Dr. Helen Powell-Stoddart uses her extensive medical knowledge and experience to help men and women find freedom from pain and live in abundant health. With the death of her mother at a young age and her father's terminal diagnosis, Dr. Helen purposed to understand everything she could about disease processes and the body's innate ability to heal itself in the right conditions.

With more than 20 years of experience, Dr. Helen combines conventional and alternative medicine to help her patients achieve optimal health. Over the years, she has pioneered and fine-tuned a comprehensive diet and nutrition program to make it easy for men and women to thrive.

INFORMATION WE COLLECT

The personal information that we may collect from and about you broadly falls into the following categories.

Information we collect directly. You may provide personal information to us through Medical Services – for example, when you sign up for our patient portal, order, subscribe to, or make use of any of our Services, consult with our office medical team, or communicate with us in any way.

We may also collect personal information, such as your contact and professional details, when you attend our events, take part in surveys, or through other business or marketing interactions we may have with you. You may choose to provide additional information when you communicate with us or otherwise interact with us.

In most cases your provision of personal information to us is entirely voluntary. However, if you fail to provide such information, we may not be able to provide certain Services or information to you.

The personal information you provide may include:

- **Contact Information**: When setting up a P2WH account to access or subscribe to the portal (NextGen Health Fusion), you will be asked to provide certain information, including contact information (such as name, address, email, or telephone number), and other personal information (such as primary or secondary insurance).
- **Financial Information**: If you are paying for any of the Services (for example, through one of our online check-out pages), we may require you to provide credit card or other financial information in order to process a payment from you. You should never provide detailed credit card information directly to P2WH via an unsecure form (such as email).
- **Transaction Information**: We will maintain a record of your purchases, transactional information, your Medical Services history, and usage. We may also retain your communications with us and our responses.
- Partner Products & Services Offered on the Services: Third parties, such as our partners (Constant Contact), sponsors, or advertisers whose services are promoted or advertised on the website or email marketing, may request that you provide personal information. Please see How We Share Information in Section 4 below for further details.
- **Research Surveys**: You may elect to provide information in connection with research surveys in which you participate.
- **Emails to P2WH**: If you send us emails, you should be aware that any information provided in an email may not be secure or encrypted and therefore may be available to others. Please exercise caution if you decide to disclose any personal or confidential information to us in any email.

• **Job Applicants to P2WH**: When applying for select job postings at P2WH, we will ask you to send us your resume or other relevant information online.

Information we collect automatically. When you use the P2WH Services website, we (or our third party partners) may collect information about your device and usage of the Services. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

We may use a variety of technologies (collectively, "Tracking Technologies") to collect some of this information. Our use of Tracking Technologies is discussed in more detail in Tracking Technologies and Advertising and Analytics Services in Section 5 below.

We may use Tracking Technologies to automatically collect the information described below:

- **Device Information**: We may collect certain information about the device you use to access the Services, including but not limited to IP addresses for your devices, unique device identifiers, browser types, and browser language.
- User History: We may log certain usage information about your use of P2WH Services, which may include a history of the pages you view. If you download and use any P2WH software or application on your device, the log files will automatically be collected by the application and sent to our servers when your device syncs up for the latest content available.
- Mobile/Location Information: We may collect additional information from you if you access the Services through a mobile device, for example we may collect your unique device identifier, your device's operating system, mobile carrier, or your location when you opt in for us to do so. However the degree to which your location can be identified depends on the device you are using (e.g. laptop, smartphone, tablet) and how you are connected to the internet (e.g. via cable broadband connection, Wi-Fi, etc.). If you enable location services for the Services we may collect your regional location data periodically as you use or leave open the Services. We may also collect your location information from your IP address or zip code.

We may also use location data internally or in conjunction with our third party service providers to customize your experience and provide offers that may be relevant to you. Depending on the device you use to access the Services (e.g. AppleTM iOS, GoogleTM Android, Windows, etc.) you may be able to control whether location data is collected from the settings on your wireless device.

Information we collect from third party sources.

• Third Party Sources: From time to time we may obtain personal information about you from third party sources, such as public databases, social networking services, third party data providers and our joint marketing partners. Examples of the information we may receive from third party sources include job title, company, location, updated contact information, and other demographic and professional information. We use this information, alone or in combination with other information (including personal

information we collect), to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products, features, and services.

• Social Networking Accounts: When you choose to log into your P2WH account through your LexisNexis account or social networking accounts, link your social networking accounts with the Services, or engage with the Services through the LexisNexis platform or third party social media platforms, you may be allowing us ongoing access to certain information stored on those platforms. In addition, as you interact with the Services, you may also be providing information about your activities to LexisNexis or the third party social networking platforms, as applicable. You should make sure that you are comfortable with the information such services may make available to us by visiting the applicable platforms' privacy policies and/or modifying your privacy settings directly with those platforms.

HOW WE USE THE INFORMATION WE COLLECT

We may use the personal information that we collect through the Services to:

- Provide the products and services you request, process transactions, and send you related information, including confirmations and receipts.
- Provide support and improve the Services and to manage system administration and security.
- Respond to your comments, inquiries, and requests and provide customer service.
- Link or combine information that we collect directly with information from third-party sources or multiple devices to help understand your needs, provide you with personalized content, and provide you with better service.
- Personalize and improve your experience and deliver content or features that match your profile and interests, including to show you targeted advertising as described in Tracking Technologies and Advertising and Analytics Services in Section 5 below. Please also review Section 6 below for further information about Your Choices/How to Opt Out.
- Send you marketing and promotional communications (in accordance with your marketing preferences). Please see Your Choices/How to Opt Out in Section 6 below.
- Send you e-mail newsletters and alerts (in accordance with your newsletter and alerts preferences). Please see Your Choices/How to Opt Out in Section 6 below.
- Perform statistical and marketing analyses of user behavior.
- Manage your account(s) and send you technical privacy policy and service updates, security alerts, and other administrative messages.
- Send you push notifications. Please see Your Choices/How to Opt Out in Section 6 below.
- Conduct surveys.

- Process and deliver sweepstakes and other promotions.
- Comply with or enforce legal requirements, agreements, and policies.
- Evaluate candidate submissions for job postings.
- Carry out any other purpose for which the information was collected.
- Perform other activities that are in our legitimate business interests and consistent with this Privacy Policy.

HOW WE SHARE INFORMATION

We may share your personal information with the following types of third parties for the purposes described in this Privacy Policy:

- Administrator Uses: If your use of the Services is managed for you by an account administrator then your account administrator and resellers who provide user support to your organization may have access to your personal information (including your email and other data). Please refer to your account administrator's privacy policy for more information.
- Partner Products & Services Offered on the P2WH Services: If you provide personal information in order to access products or services of third parties, such as our partners, sponsors or advertisers, that are offered or promoted on or through the Services, you may be providing your information to both P2WH and the third party. For example, when you enter your personal information in order to download a white paper offered by a partner on the Services, both P2WH and the partner may receive your personal information. Your personal information will be subject to this Privacy Policy as well as the privacy policy and practices of such third party. P2WH is not responsible for and this Privacy Policy does not cover such third party's use of your personal information.
- Sharing Information with Marketing Partners: P2WH selectively makes its postal mailing address list and email list, for customers in the United States, available to third party partners so that they may provide you with information about product or service offerings, events or promotions, which may be of interest to you. You may opt-out of having such information shared for this purpose. Please see Your Choices/How to Opt-Out in Section 6 below.
- Third Parties Providing Functionality: We also work with third parties to provide certain functionalities on the Services and to improve the effectiveness of the Services and its content. Separate and distinct from information P2WH shares with third parties, third party companies may also use Tracking Technologies to independently collect and store information about you and your usage of the Services and may combine this information with information they collect from other sources. Please note, we do not control Tracking Technologies used by third parties, and their use of such Tracking Technologies may be governed by their own privacy policies.
- **Third Party Event Sponsors**: When you register for a P2WH event (including any webinars and recognition dinners), we may share the information you provide, such as your name, company name, postal address and email address, with third parties who are

sponsoring the event. You may opt-out of having such information shared for this purpose, as described in greater detail in Your Choices/How to Opt Out in Section 6 below.

- **Mobile Carriers**: If you access the Services through a device or app, we may share your information with mobile carriers, operating systems, and platforms.
- Compliance with Law: P2WH may release information if it is required to do so by law or in the good-faith belief that such action is necessary to: (1) comply with the law or comply with legal process served on P2WH; (2) protect and defend the legitimate business interests, rights or property of P2WH, its users, advertisers, customers, sponsors, advertisers, or affiliates; and (3) if we believe your actions are inconsistent with our Terms of Use or policies.
- **Service Providers**: Sometimes we need to share your information with our third-party service providers, who help us provide and support the Services and other business functions. For example, we use service providers to assist with the following: analyzing data, hosting data, engaging technical support, processing payments, delivering content, mailing statements to subscribers, email distribution, and providing customer service.
- Advertising Partners: We may partner with third party advertising networks and exchanges to display advertising on our websites or to manage and serve our advertising on other sites and may share your personal information with them for this purpose. Please see more information in Your Choices/How to Opt Out in Section 6 below.
- Organizational Changes: Should P2WH undergo a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, P2WH's accumulated customer information will be treated as an asset and, like other business assets, subject to transfer to or acquisition by a third party. We may also disclose information about our users in connection with a commercial transaction where we, or any one of our businesses, is seeking financing, investment, support, or funding.
- With Your Consent or at Your Direction.

TRACKING TECHNOLOGIES AND ADVERTISING AND ANALYTICS SERVICES

• Targeted Advertising: We and our third party partners and vendors may use Tracking Technologies, such as cookies, pixels, and web beacons and collect and store information about you when you use or interact with our Services, marketing communications, advertising content and/or third party websites, in order to provide you with targeted advertising based on your browsing activities and interests. These third parties automatically receive your IP address or mobile device identifier when you access the Services or third party websites. They may also use Tracking Technologies to measure the effectiveness of advertisements, to personalize the advertising content, and to serve you advertisements that are relevant to your regional location. We may also use information collected using third party cookies and beacons on the Services and in our emails to deliver advertising about our Services when you visit third party websites. To find out more about our use of Tracking Technologies as well as how to manage your preferences please see our Tracking Technologies Notice.

- Analytics and Ad Serving: Google, Tealium and Site Catalyst are some of the companies that we use to serve advertising and perform analytics on some of the Services. When you access the Services, our third-party vendors, including Google, use third-party cookies (such as the Google DoubleClick cookie) to serve you ads based on your previous visit to our website and other websites. To learn more about your choices and in particular Google's currently available opt-outs for the Web, please see Your Choices/How to Opt Out in Section 6 below.
- Cross Device Tracking: We (and our third party service providers) also use Tracking Technologies that recognize and collect usage information and information about the devices you use to connect with our Services and third party websites. When these tools are enabled, the data that we and our third-party service providers collect about these devices is used to enable delivery of product recommendations, advertising, or other promotional materials across your devices that are more relevant information to you, or to measure the effectiveness of our Services and advertising. They automatically receive your IP address or mobile device identifier when you connect to the Services or third party websites. This data may be combined with the same information from another browser or device if you use multiple browsers or devices. You may opt-out of this type of tracking/information collection by clicking here. This opt-out applies to the specific device/browser combination on which you are browsing, so you will need to opt-out on each device and browser separately. Please note opting out of targeted advertising does not opt you out of being served ads. You will continue to receive untargeted generic ads.

YOUR CHOICES/HOW TO OPT OUT

• Email:

- Opt-out Links: Any recipient of email notices may opt out of receiving them at any time. To opt out of receiving emails, follow the unsubscribe instructions located near the bottom of each service update, newsletter, or promotional email, or email your request to info@P2WH.com.
- Email Newsletters: You can view, change, or update any or all of your email newsletter subscriptions by going to your Newsletters preference center preference center.
- o **Marketing Emails**: You can view, change, or update any or all of your marketing email preferences by going to your Email Marketing preference center.
- o Research Surveys Sent by Email: You may elect not to receive research surveys conducted by P2WH's Intelligence division that are sent by email by using the opt-out link contained in such emails. In addition, you may elect not to receive surveys conducted in conjunction with P2WH's marketing partners by unsubscribing from third party partner emails on your email marketing preference center here.
- **Postal Addresses**: P2WH collects postal mailing address information from you so that P2WH may fulfill the subscriptions and orders you submit and to inform you of P2WH programs, products, and services in which you may be interested. If you want to opt out of receiving marketing communications via postal mail from P2WH in the future, please

- send an email to <u>info@P2WH.com</u>. Please note that even if you opt out of receiving marketing communications by postal mail, we may continue to send you transactional communications about your subscription or orders by postal mail.
- **Push Notifications**: If you use our mobile apps, we may ask if you want to receive push notifications so that we can send you updates, communications, and other messages about the Services. To opt out of getting these push notifications or other messages, you must turn off the push notification function in your device settings.
- Sharing with Third Party Partners: P2WH selectively makes its postal mailing address list and email list of customers available to third parties whose products or service offerings may be of interest to you. If you do not wish for P2WH to provide either your postal mailing or email information (or both) to third parties for this purpose, please send us a notice using the contact details provided in Contact Us. California Residents please also see Section 8 below. You can also specify that you do not want your email information shared with third party marketing partners by going to your preference center here and updating your third party email marketing preferences.
- **Third Party Event Sponsors**: If you do not wish for P2WH to share the information you supply when you register for an event (including any webinars and recognition dinners), such as your name, company name, postal address, or email address, with the event's sponsors, please specify this in an email to info@P2WH.com.
- Turning Off Tracking Technologies: You can choose to have your computer warn you each time a persistent or session cookie is being sent, or you can choose to turn off such cookies through your browser settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies. However, cookie management tools provided by your browser will not remove Flash cookies and may not disable HTML5 storage. It is important to remember that many of P2WH's services may not function properly if your cookies are disabled. For example, P2WH needs first-party cookies to log you in to the Services that require registration or a subscription. In that case, you may set your browser to block third-party cookies and allow P2WH's first-party cookies only.
- "Do Not Track" Signals: Some third party browsers provide "do not track" machine readable signals for websites which are automatically applied by default and therefore do not necessarily reflect our visitor's choice as to whether they wish to receive advertisements tailored to their interests. As a result, at this time, P2WH does not respond to browser "do not track" signals or other similar mechanisms. Please note that the-opt out is cookie-based and will only affect the specific computer and browser on which the opt-out is applied.
- Network Advertising Initiative: Some of our advertising service providers may be members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. If you opt-out of receiving targeted ads in this manner, you will continue to receive advertising messages from us, but other members of the Network Advertising Initiative will not be able to target you based on your use of the Services and/or third party websites.

• Google Opt-Outs: Google is one of the companies that we use to serve advertising and perform analytics on some of the Services. To learn about Google Analytics' currently available opt-outs for the Web, click here. To learn more about how Google uses cookies in advertising, you can visit the Google Advertising Privacy & Terms policy located here. You can opt out of receiving interest-based Google ads, or customize the ads Google shows you, by clicking here. P2WH also uses third party services for remarketing P2WH's products and services, such as Google's Customer Match via the Google platform, whereby we will deliver targeted ads to you based on your prior usage on the Services. If you want to opt-out of remarketing, please email us at info@P2WH.com.

RIGHT OF ACCESS

You may access, correct, or update the information you have provided to us. P2WH takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You can update your account information by logging into your online account and updating your contact and profile information. You can view, change or update your editorial newsletter preferences, email marketing preferences and alert preferences by logging into your online account and going to your preference center here. You may also contact us at any time by using the contact details provided in Contact Us Section below.

* We need certain types of information so that we can provide our Services to you. If you ask us to delete it, you may no longer be able to access or use our Services.

LINKS TO OTHER WEBSITES

P2WH is not responsible for the content or the privacy policies of websites to which it may link. This Privacy Policy applies solely to information collected by P2WH. You should consult the respective privacy policies of any applicable third parties to learn more about their privacy practices.

HOW WE KEEP YOUR INFORMATION SECURE

To help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of information, we have put in place appropriate technical, organizational, physical, electronic, and managerial procedures designed to protect the information we collect. Specific measures we use include installing anti-intrusion hardware and firewalls, conducting penetration testing and virus scans, monitoring Operating System and software logs and applying software patches. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Please understand, however, that while we try our best to safeguard your personally identifiable information once we receive it, no transmission of data over the Internet or any social media or other public network can be guaranteed to be 100% secure.

To help protect the privacy of your own information, including maintaining the confidentiality of any account information or access credentials, we recommend you take precautions to protect

the security of any personal information that you transmit over any public or untrusted network by using encryption and other techniques to prevent unauthorized persons from intercepting or receiving any of your personally identifiable information. You are responsible for the security of your information when using unencrypted, open access, public or otherwise unsecured networks.

CHILDREN

Our Services are directed at a general audience and not directed to those under the age of 18. P2WH asks that minors not submit any personal information. P2WH does not knowingly collect personal information from individuals under 18 years of age and if we obtain actual knowledge that a user is under 18 years of age, we will take steps to remove that individual's personal information from our systems.

HOW LONG DO WE RETAIN YOUR INFORMATION?

We retain personal information we collect from you where we have an ongoing legitimate business need to do so. For example, we retain information in order to provide you with services, to comply with applicable legal, tax, or accounting requirements, and to enforce our agreements, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our terms of use, or take other actions permitted by law. We may also retain information to prevent re-registration in the event that your account has been suspended or terminated or to create an archival copy of your information, which might be used by us for record keeping and internal purposes.

13. ADDITIONAL NOTICE TO RESIDENTS OF THE EUROPEAN ECONOMIC AREA (EEA)

13.1 Your Data Protection Rights

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- You may request access to or ask us to correct, update, or delete your personal information. You can update account information by logging into your online account and updating your contact and profile information. You also can view, change, or update your editorial newsletter preferences, email marketing preferences, and alert preferences by logging into your online account and going to your preference center here. However, if you don't have an account with us or want to contact us directly about accessing, correcting, updating, or deleting your personal information or changing your marketing preferences, you can do so at any time by contacting us with the contact details provided in Contact Us. We will consider your request in accordance with applicable laws.
- o In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information, or request portability of your personal information. Again, you can exercise these rights by contacting us using the data inquiry form or contact details provided in Contact Us Section.

- Similarly, if we have collected and processed your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

Legal Basis for Processing Personal Information

- o If you are a resident of the EEA, our legal basis for collecting and using the personal information described in this Privacy Policy will depend on the personal information concerned and the specific context in which we collect it.
- O However, we will normally collect personal information from you where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Typically, our legitimate interests include: improving, maintaining, providing, and enhancing our technology, products, content, and services; ensuring the security of the Services; and conducting marketing activities.
- If you have signed up for the Services on your own behalf, we may need your personal information to perform a contract with you. In some limited cases, we may also have a legal obligation to collect personal information from you.
- Where required by law, we will collect your personal information only where we have your consent to do so.
- If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in Contact Us in Section 16.

International Data Transfers

The Services are operated in the United States. If you are located anywhere outside of the United States (including in the EEA), please be aware that information we collect, including personal information, will be transferred to, processed and stored in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European data protection law. Our standard Contractual Clauses can be provided upon request by contacting us at info@P2WH.com. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

How to Exercise Your Rights

If you are an EEA resident, you may exercise your rights or authorize another person to act on your behalf by:

• Calling our Customer Service at 256-248-9589 or email <u>info@P2WH.com</u>.

CHANGES TO THIS PRIVACY POLICY

From time to time, P2WH may update its Privacy Policy. Where these changes are material in nature we may notify you either by prominently posting a notice of such changes prior to implementing them, by directly sending you a notification, or by posting the most recent version of the Privacy Policy on the Services, with the "Last Updated" date posted at the top. You should check the Services frequently for updates. By accessing the Services after the "Last Updated" date, you are deemed to consent to our then-current Privacy Policy. We encourage you to review this Privacy Policy frequently to be informed of how P2WH is collecting and protecting your information.

DISPUTE RESOLUTION FOR UNITED STATES RESIDENTS/ARBITRATION/LIMITATION OF LIABILITY

If you are a resident of the United States and you choose to use the Services, any dispute over privacy is subject to this Privacy Policy and P2WH's Terms of Use including arbitration, limitations on damages, resolution of disputes, and application of the laws of the United States and the State of Alabama.

CONTACT INFORMATION

If you have any questions, comments or concerns, please contact us using the details below:

For United States and other Non-EEA residents:

Pain 2 Wellness Healthcare Corp. Attn: Customer Service 235 Portal Lane Suite B Madison, AL 35758 Phone: 256-325-5700

Email: info@p2wh.com

Asbury gathers two types of information about the site's users:

1. Non-personally identifiable information. As users access the site, Asbury collects and aggregates information indicating, among other things, which pages were visited, the order in which they were visited, and which hyperlinks were employed. Collecting such information involves the logging of IP addresses, operating system, and browser software

used by each visitor. Although such information is not personally identifiable, the Practice can determine from the IP address a visitor's Internet Service Provider and the geographic location of the user's point of connectivity.

The non-personally identifiable information collected helps in diagnosing any server problems, administering the site, identifying the most popular areas of the site, and determining the effectiveness of promotional activities.

For the same purposes, the Practice uses "cookies" – that is, small text files placed on your computer's hard drive – to help determine the type of content and sites visited, the length of time spent on a particular site, and the usage of services offered via the site. For information on how users can control their Web browser's acceptance of cookies, please refer to the documentation accompanying the browser.

2. Personally identifiable information. Certain areas of the site may require that users provide personally identifiable information (including, for example, zip code, age, income, and email address). In addition, when registering to set up an account to use certain services on the site such as email, chat rooms, forums, or to receive newsletters or specifically targeted information ("services"), Asbury may require that users provide their name and email address.

The Practice does not knowingly collect personally identifiable information from children (defined herein as minors younger than thirteen years of age) without obtaining parental consent. Before registering for an account to use the services of the site, Asbury requests that all minors have their parents read the Privacy Policy and continue their involvement throughout the registration process.

Asbury does not control the acts of this site's members or visitors. All members and visitors should be aware that their disclosure of personally identifiable information in a bulletin board, chat room, guest book, or other forum allows other parties to send them unsolicited email. In the event visitors encounter any user on this site who is improperly collecting or using information provided by the site's members or visitors, please contact info@p2whealth.com.

How the Practice Uses/Does Not Use Gathered Information

Please take some time to become familiar with the different ways Asbury uses the information gathered. Keep in mind that, while the Practice encourages all third parties involved to adhere to this site's Privacy Policy and to otherwise handle personal information in a responsible manner, Asbury cannot and does not assume any responsibility for any actions or omissions of third parties, including the manner in which they use information received either from the Practice or independently. Nevertheless, in the event users encounter any third party associated with, or who claims association with Asbury, who is improperly collecting or using personal information, please contact <code>info@p2whealth.com</code>who will forward the message to the third party.

1. Use of non-personally identifiable information. The Practice uses non-personally identifiable information in aggregate form to build higher quality, more useful online services by performing statistical analyses of the collective characteristics and behavior of the site visitors, and by measuring demographics and interests regarding specific areas of the site.

The site may contain links to other Internet websites, including co-branded or other affiliated sites that may or may not be owned or operated by Asbury. Unless otherwise explicitly stated, the Practice is not responsible for the privacy practices or the content of such sites, including such sites' use of any information (such as IP address, browser type, or operating system) collected when visitors to the site click through links to those sites. Even though such information might not identify the user personally, users should be familiar with the privacy practices of those other sites.

2. Use of personally identifiable information. The Practice provides notice to potential registrants of this site whose personally identifiable information will be collected during the registration process. Such notice is provided simultaneously with the user's registration on this site; moreover, this policy itself serves as notice that such information is collected under those circumstances. Although users may not "opt out" of the registration process and still receive access to the services, users may choose to "opt out" of receiving promotional materials from the Practice and/or other business partners. If the user does not "opt out" of receiving such promotional materials, Asbury reserves the right to release user's personally identifiable registration information to third parties who provide goods or services that the Practice believes may be of interest to the user. If the user decides to discontinue receiving promotional information from such third parties, please contact those third parties directly, or contact Asbury at info@p2whealth.com.

Asbury limits its own email contact and solicitations to those users who have not "opted out" of receiving such communications. The solicitations are limited in that they, among other things, will clearly indicate the originator of the email and provide the user with a method of "opting out" of receiving future communications of a similar nature.

Finally, Asbury may use individual members' data to "pre-populate" forms, which are displayed for the purpose of collecting individual data by the Practice. In no case does pre-populating a form transfer any data to any third party. Only if the user voluntarily requests that such data be transferred will any transfer take place – for example, if/when a user clicks a "submit form" button or other button.

Asbury reserves the right to release any and all information contained within access logs concerning any visitor when that visitor is in violation of the Practice's "Terms of Service" agreement or other published guidelines, or partakes (or is reasonably suspected of partaking) in any illegal activity, even without a subpoena, warrant, or other court order, and to release such information in response to discovery requests, or in response to any circumstance in which the Practice, in its sole discretion, deems an emergency. Asbury cooperates with law enforcement agencies in identifying those who

may be using its servers or services for illegal activities. Asbury also reserves the right to report any suspected illegal activity to law enforcement for investigation or prosecution.

Asbury will post the relevant privacy information in the official rules and/or registration area for any promotions it sponsors. That privacy information, to the extent it conflicts with this Privacy Policy, will govern that particular promotion.

Security

All information gathered on the site is stored within a controlled database accessible only to the Practice to protect the loss, misuse, or alteration of the information under its control. However, as effective as any security measure implemented by the Practice may be, no security system is impenetrable. Asbury cannot guarantee the security of its database, nor can it guarantee that the information supplied by users will not be intercepted while being transmitted over the Internet. Questions regarding this Privacy Policy should be directed to **info@p2whealth.com**.

Changing/Deleting Personal Information

If users would like to have personally identifiable information changed or removed from Asbury's database, please contact **info@p2whealth.com**. Keep in mind that there will be residual information remaining within the databases, access logs, and other records, which may or may not contain such personally identifiable information. The residual information will not be used for commercial purposes; however, the Practice reserves the right, from time to time, to re-contact former customers or users of this site.

Ouestions?

Questions regarding the Privacy Policy should be directed to the Practice at **info@p2whealth.com**.

Pain 2 Wellness Healthcare 235 Portal Lane Madison, AL 35756