# **Privacy Policy**

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#### **Introduction**

This Privacy Policy ("**Policy**") concerns you the customer booking any of our holistic wellness services (our "**Services**") or even if you are simply just browsing our website. We provide this Policy to explain to you how we handle the personally identifiable information ("**PII**") and other non-PII we collect when you use our Services. This includes how we collect it, why and how we use it, how we secure it, your privacy rights, and any other disclosures about our privacy practices.

Please, endeavor to read the entirety of this Policy to understand our privacy practices before using our Services. By using our Services, you consent to this Policy. If otherwise – that you do not agree to our practices – you should not use our Services.

#### Who we are

We are The Healing Path, LLC, a company registered and operating in St. Louis, MO (herein as "**The Healing Path**," "**we**," "**us**," or "**our**"). We are responsible for the collection and use of your PII with respect to your use of our Services.

If you have any questions, inquiries, complaints, or concerns regarding how we use your PII, please reach out to us with the contact information provided below (or alternatively use the "Contact Us" section of our website):

Phone: 314-226-5364

Email: kimorphan@reikicrystals.net

### The Information we Collect

We collect PII and non-PII in two ways: Those you give us willingly and those we collect automatically.

#### Information you give to us.

You may give us PII via various means when you use our Services. This may include, without limitation, when you book and pay for a Service, contact us, respond to a survey (or enter a promotion), leave a review, fill out any other form, or engage in other activities, services, features, or resources we make available on our website.

The PII we may collect includes, but is not limited to:

- Name
- Email address
- Phone number
- Payment information (credit card details, billing address, etc.)
- Other information relevant to customer surveys and/or offers.

Under applicable laws, some of the PII you submit to us (such as your payment method information) is considered sensitive PII. Where we collect sensitive PII, we ensure additional protection is applied.

#### Information we collect automatically.

When you access our website or interact with certain features, we automatically collect certain information (mostly hashed, aggregated, non-PII). This information may include information about your device IP Address, geolocation, and related identifiers; Information about analytics and use of our website, including areas accessed, features used, duration of use, and referring website; and Information about your transactions, which include the Service purchased, the amount paid, date and time, and other pertinent information about your payments.

We may collect this information using third-party tools like Google Analytics. These tools make use of tracking technologies, such as cookies, beacons, clear gifs, pixels, and tags, which are responsible for automatically collecting this information.

# Why we Collect your Information

We primarily collect the information described above to take your booking, schedule an appointment, take your payments, and provide our Services.

More specific reasons include:

- Communication: We collect your phone number and email address to communicate with you, including to confirming your appointments, responding to your inquiries, notifying you of updates to your appointments and our Services, and establishing any other two-way communication between you and us.
- Payments: We collect your payment method information, such as your billing address and card numbers, to enable us (through our payment processing third party) to process your payments for our Services.
- **User identification:** We collect your name and other PII to identify you and ensure we are providing our Services to the right customer. Also, we collect and store your PII to enable us to identify and seamlessly process your appointment on subsequent orders.

- **Service improvement:** We collect analytics and usage information to identify how our Services, websites, and certain features are doing and how we can improve.
- **Fraud prevention:** We also collect certain PII to identify and prevent users from fraudulent practices and violations of our <u>Terms of Service</u> or any applicable laws.
- **Legal obligations:** We collect some information (such as transaction information) for reasons such as compliance with our legal obligations of keeping records.

#### **How we Disclose Information**

The Healing Path does not engage in the sale of PII for monetary consideration. We may only share PII with third parties if it directly involves the provision of our Services. We may disclose information with third parties under the circumstances below:

#### Third-party service providers

We work with third parties who provide certain services on our behalf, including appointment scheduling, PII storage, payment processing, analytics reporting, telecommunication, website hosting, and so on. These third parties may access your information to provide their services.

Our major third parties and the services they provide for us may include the following:

- MindBody: They help us with appointment scheduling, analytics reporting, PII storage, and payment processing. The information you provide when you book your appointment is collected and stored by MindBody. Read MindBody's <u>privacy policy</u> to learn about their privacy practices.
- Google: To gather analytics and perform many other services. See Google's privacy policy to learn about their privacy practices.
- Vistaprint: For website hosting and development. See Vistaprint's <u>privacy</u> <u>policy</u> to learn about their privacy practices.
- Vonage: They help us with the communication between us and users. See Vonage's <u>privacy policy</u> to learn about their privacy practices.

#### The Healing Path employees and contractors

The Healing Path comprises employees who perform tasks, such as customer support for us. We also have practitioners who provide yoga, reiki, acupuncture, and other holistic wellness services as hired contractors. These individuals will have access to any information you submit when dealing with them.

#### Other entities and the law

We may disclose PII to other entities if such disclosure is necessary to respond to a court order or to conform to a legal requirement; to enforce our Terms of Service or other agreements; to protect our rights and properties, or the rights and properties of other users or third parties.

#### Other entities in a business transfer transaction

We may disclose PII to entities in a business transfer transaction, such as a merger, acquisition, consolidation, sale of assets, or bankruptcy.

## **How we Protect your Information**

We adopt appropriate data collection, storage, and processing practices, and security measures to protect against unauthorized access, alteration, disclosure, or destruction of your PII, especially your payment method information. All information transmitted via our website is secure using Secure Socket Layer (SSL) encryption. This security creates an encrypted link between a web server and a web browser, which secures your transactions and associated PII private.

Also, we do not use your information (especially your name, email address, and phone number) for any other purposes different from the reasons described above. We also do not engage in the sale of PII for monetary consideration and targeted advertising.

However, the security of information in the digital space has no absolute guarantee. We cannot guarantee 100% that unauthorized third parties will not access your information.

## **Cookies and Similar Technologies**

We do not directly use cookies on our website. However, our third-party service providers may set cookies, as well as beacons, gifs, tags, pixels, and similar tracking technologies ("**Cookies**") on your device to perform certain tasks.

Cookies are tiny text files that are stored on your device (whether computer, tablet, or phone) when you access a website or click a content. They are normally used to gather analytics, provide a better user experience, secure the website, make certain functions work, and remember users.

The Cookies existing when you use our website are set by third parties to enable them to perform their services. For example, Google uses Cookies to enable its tool, Google Analytics, to track and gather anonymous information about users.

Cookies can either be session or persistent. This means that they can exist and expire when you open and close your browser. And they can also have specified expiry dates, which may be between minutes to months.

You have the right to reject Cookies when you use our website. You can control Cookies through your browser privacy settings. Most web browsers allow you to manage your Cookie preferences and delete Cookies already stored on your device. Please note that disabling or deleting Cookies may affect the functionality and performance of our website and may limit your access to certain features.

## **Third-Party Services**

#### **Third-party tools**

We may use tools created by third-party entities (such as Google, Inc.) to provide some of the features on our website. For example, we use Google Analytics to gather anonymous analytics information, which we use to monitor the progress of our Services. Although Google Analytics collects hashed, anonymous, and aggregated information, you can still opt out of Google Analytics tracking your use of our website. You can download the Google Analytics Opt-out browser add-on on your browser.

#### Third-party links

Our website may contain links to third-party websites and services that are not operated or controlled by us. Please note that The Healing Path has no control over the content, privacy policies, or practices of any third-party websites or services existing on our website.

We encourage you to be aware when you leave our website and to read the privacy policies of any other website or service that you visit. We do not assume any responsibility or liability for the content and activities of these linked websites or services.

### The Cross-Border Transfer of your PII

We collect and use your PII from our location in St Louis, MO, United States (US), and we handle your information in accordance with the applicable US privacy laws. However, your PII may also be transferred and maintained on servers across the locations where our third-party service providers are. But we care about your privacy and ensure these third parties employ adequate privacy practices – plus, we ensure they are trusted and top in their industry.

## How Long we keep your Information

We do not keep your PII for more than we need it. When you book an appointment, we retain the PII on our database indefinitely so as to easily attend to you when you book another appointment. Upon your request to exercise your right of deletion (see below), we will delete your PII – except where the deletion is not possible due to any ongoing investigation or legal requirements.

## **Your Privacy Rights**

With respect to your PII, you have certain rights regarding how we handle and use it. Your rights include:

- You have the right to refuse to provide any PII required on our website and associated platforms. However, you agree that the discharge of a particular Service may not be possible without access to relevant information.
- If you need to have us delete any PII you have submitted when booking a
  Service or any submitted via forms, you can make a request at
  <a href="mailto:kimorphan@reikicrystals.net">kimorphan@reikicrystals.net</a>. We will delete your PII as soon as reasonably
  possible.
- If you have ever consented that we use your PII for a particular purpose based on your consent, you can withdraw your consent at any time you so wish.

# **Children Policy**

At The Healing Path, we do not target our Services or intend them for children or minors (people under 18 years of age). We do not knowingly collect or solicit PII. If we become aware that we have unintentionally collected PII from a child, we will take immediate steps to delete that information from our records. We strongly encourage parents and guardians to monitor their children's online activities and to help enforce our Policy by ensuring that their children do not provide any PII on our website. If you believe that we may have collected PII from a child without appropriate consent, please contact us immediately, and we will promptly investigate and take necessary action to address the situation.

#### **Notice to California Users**

This section applies if you access our website or use our Services from the State of California. This provision provides information about your rights and our obligations under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA).

Please, note that we do not engage in interest-based advertising, nor do we sell or trade your PII with third parties for them to market their services to you.

Also, your web browser may have a Do Not Track (DNT) feature, which when enabled, transmits a notice to us to not track your online behavior. At this time, The Healing Path does not respond to signals from the DNT feature, as there is no universally accepted consensus among industry participants.

In addition to other rights under our Policy, your rights under the CCPA and CPRA include:

- The right to request information about the categories of PII we have collected about you in the past 12 calendar months, including the sources from which we obtained this information, the reasons for the collection, and the third parties we have shared them with.
- The right to request that we delete the PII we hold about you, subject to certain exceptions.
- The right to opt out of the sale of your PII to third parties for direct marketing. As mentioned earlier, we are not in the business of selling PII to third parties for monetary consideration.
- You have the right to non-discrimination if you request to exercise any of your rights under the CCPA and CPRA.
- You have the right to request that we limit your payment method and billing information strictly for the purpose of processing your order payments.
   Fortunately, we do not use your information for anything else other than processing your appointment fees.

You can exercise any of your rights under the CCPA and CPRA by reaching out to The Healing Path at <a href="mailto:kimorphan@reikicrystals.net">kimorphan@reikicrystals.net</a> or using the "Contact Us" section of our website. We may need to verify your identity before processing your request.

You or any party you designate may make your request. If it involves the deletion of your PII, we may verify you to further delete your PII. This is to ascertain that the person who provided PII to us or their agent is making the request.

# Rights of Users in Nevada

Since we do not engage in the sale of PII to third parties for monetary consideration, you cannot make a request for us to opt you out of the sale of your PII to third parties and for that third party to license the same PII to additional third

parties. However, you can still opt out of any future sale of your PII by reaching out to us at <a href="mailto:kimorphan@reikicrystals.net">kimorphan@reikicrystals.net</a> if you have used our Services.

## **Changes to our Policy**

We have the discretion to update this Policy at any time based on changes to our practices or applicable laws. When we change our Policy, we will revise the *Effective Date* at the top of this page. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the PII we collect. You acknowledge and agree that it is your responsibility to review our Policy periodically and become aware of changes.

### **Contacting Us**

If you have any questions or concerns regarding our Policy, please contact us at <a href="mailto:kimorphan@reikicrystals.net">kimorphan@reikicrystals.net</a>. We will make every effort to address your inquiries in a timely and satisfactory manner.