

**BELLAVITA TRADING  
COMPANY**

**Privacy Policy**

**Effective Date: April 1, 2024**

**Last Updated: December 2, 2023**

**1. Introduction**

BellaVita Trading Company (“BellaVita,” “we,” “us,” or “our”) oversees this website, www.bellavitaclinics.com (“Site”) and all related services (collectively, our “Services”). We have developed this Privacy Policy to

inform all users (“user(s),” “you,” or “your”) about how we collect information in the course of conducting our business, including on the Site, how we use the collected information, and a user’s rights with respect to the collected information.

Please read this Privacy Policy carefully. If you do not agree to be bound by this Privacy Policy, then do not access or use the Site or Services. By accessing and/or using the Site or Services, you accept and agree to be bound by this Privacy Policy. This Privacy Policy is incorporated into our Terms of Use www.bellavitaclinics.com/terms-of-use. Your use of our Site or Services and any Personal Information (as hereafter defined) you provide through the Site or Services are subject to this Privacy Policy at all times.

YOU MUST BE AT LEAST EIGHTEEN (18) YEARS OLD TO ACCESS THE SITE AND USE OUR SERVICES. If you are under eighteen (18) years old, you are not permitted to use any part of the Services for any reason.

If you have any questions about this Privacy Policy, please contact us at legal@bellavitaclinics.com or at the contact information below.

**2. Information We Collect and How We Collect It**

When you use the Site or Services, we process certain types of Information, as described below.

a. Personal Information

“Personal Information” means any information that identifies, relates to, describes, or is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Personal Information that we collect on the Site or Services includes, but is not limited to, *[first and last names, phone number, residential address, email address, IP Address, account or screen name, and payment information.]*

When you access or use the Site or Services, you may provide Personal Information to us, such as when you request to receive information or support; complete online forms and surveys; communicate with us or our representatives, whether through standard mail, email, or telephone; *or (supply additional collection methods)]*.

b. Non-Personal Information

“Non-Personal Information” means information that does not identify you, but provides insights regarding your use of the Site or Services. For example, we collect information about your use of the Site or Services, including but not limited to Internet connections, computer equipment, browser information, websites visited before entering and after leaving the Site, and other information about your use of the Site or Services that does not identify you as a user.

*[You may be given the option to receive push notifications while using our Site or Services. In order to serve push notifications, we may need to collect your IP address and a persistent identifier from your device. You can turn off push notifications in your device settings.]*

Personal Information and Non-Personal Information are collectively referenced as “Information.” Information we collect about you may be aggregated with other users’ Information. It may also be combined with associated Personal Information that you provide to us or that we receive from third parties. *[If we combine or associate information from other sources with Personal Information that we collect through the Site or Services, we will treat the combined Information as Personal Information in accordance with this Policy. If we deidentify or aggregate Personal Information such that it reasonably cannot be linked, directly or indirectly with a particular user, then the deidentified/aggregated information is no longer Personal Information.]*

c. Geolocation Information

*You may choose to allow us to access your location by granting the Site access to your location when prompted or through your device’s location services settings. You may change these settings on your device, but this will impact your use of and access to the Site or Services.]*

d. Third-Party Social Networking Service(s)

*If you choose to access, visit, and/or use any third-party social networking service(s) that may be integrated with our Site, we may receive your Personal Information and other information about you and your computer, mobile, or other device that you have made available to those social networking services, including information about your contacts through those services. For example, some social networking services allow you to push content from our Site to your contacts or to pull information about your contacts so you can connect with them on or through our Site. Some social networking services also will facilitate registration or enhance or personalize your experience on our Site. Your decision to use a social networking service in connection with our Site is voluntary. However, you should make sure you are comfortable with the information your third-party social networking services may make available by reviewing privacy policies of those providers and/or modifying your privacy settings directly with those networking sites/services.]*

### **3. Use of Information**

We use Non-Personal Information collected by cookies, web beacons, and other Internet tracking technology to *[store your preferences, improve website navigation, make personalized features and other services available to you, to generate statistical information, monitor and analyze user traffic and usage patterns, monitor and prevent fraud, investigate complaints and potential violations of our policies, to improve the our content and the products, services, materials, and other content that we describe or make available through the Site or Services, and otherwise help administer and improve the Site or Services.]* For more information about our use of tracking technology, please contact us.

We may identify you from your Personal Information and merge or co-mingle Personal Information and Non-Personal Information. Except as otherwise stated, we may use Information we collect from you for the legitimate business purpose of providing our Site or Services to you, including, but not limited to:

- To fulfill or meet the reason you provided the Personal Information. For example, if you share your name and contact information to ask a question about our Services, we will use that Personal Information to respond to your inquiry.
- *[To establish and secure accounts to use the Site or Services, check on your account status, and to validate your username, e-mail, password, and/or other login credentials.]*

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To provide, support, personalize, and develop our Site or Services, including without limitation, to conduct aggregate or research analysis and develop business intelligence that helps us to enhance, improve, evaluate, operate, protect, make informed decisions about, and report on the performance of our Site or Services.
- To communicate information and promotional materials to you, where you have not expressed a preference otherwise, and to send you information and updates about the Site or Services.
- To notify you of any changes to relevant agreements, policies, or other terms, and to enforce such terms.
- To work with our service providers, who perform certain business functions or services on our behalf [*and who are bound by contractual obligations consistent with this Privacy Policy*].
- To prevent or investigate fraud, or for risk management purposes, and to help maintain the safety, security, and integrity of our Site or Services, databases and other technology assets, and business.
- To comply with legal obligations, court orders, or in order to exercise any legal claim or to defend against any legal claim.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our consumers is among the assets transferred.
- As otherwise described to you when collecting your Personal Information.

In addition, we may use third-party e-mail providers to deliver communications to you. This is an opt-in e-mail program. If you no longer want to receive these e-mail communications, you may opt-out of receiving e-mail communications through the "unsubscribe" link or by contacting us [unsubscribe@bellavitaclinics.com](mailto:unsubscribe@bellavitaclinics.com).

*[We may, from time to time, invite you to participate in online surveys. The information requested in these surveys may include, but is not limited to, your opinions, beliefs, insights, ideas, activities, experience, purchase history, and purchase intent regarding products, events, and Site or Services. The information collected by these surveys is used to research market trends, company growth, community needs, etc. Your input will help us to improve customer experience and shape the development of our products, Site, and Services].*

#### **4. How We Share Information**

We may share Personal Information with the following parties:

- Corporate affiliates, including corporate parents, subsidiaries, other affiliated entities, and associated entities for the purposes described in this Policy which are required to treat the information in accordance with this Privacy Policy;
- Service providers that help us administer and provide the Site or Services (for example, a web hosting company whose services we use to host our platform). These third-party services providers have access to your Personal Information only for the purpose of performing services on our behalf. *[We have entered into contractual relationships with these service providers and require them to comply with all applicable information privacy laws and regulations and to use the Information only for the purposes for which it was*

*disclosed. We require that any third-party service providers limit their use of your Information solely to providing services to us and that they maintain the confidentiality, security, and integrity of your Information and not make unauthorized use or disclosure of the Information;]*

- Authorized third parties, who are parties directly authorized by you to receive the applicable Information, such as when you authorize a third-party application provider to access your account. The use of your Information by an authorized third party is subject to the third party's privacy policy;
- Third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), in which case we will require the recipient to use such information in accordance with this Privacy Policy;
- As we believe necessary: (i) under applicable law; (ii) to enforce applicable terms and conditions; (iii) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; (iv) to detect, prevent, or otherwise address fraud, security or technical issues; (v) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment and (vi) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence; and
- Pursuant to your express consent.

## **5. Information Security**

We take reasonable steps online and offline to safeguard the Personal Information that you provide to us.

It is common knowledge that transmission of information via the Internet is not wholly secure, and we cannot guarantee or warrant the security of your Personal Information, or any other information, transmitted to or through our Site or Services or otherwise provided to us. We are not responsible for the theft, destruction, or inadvertent disclosure of such information. It is your responsibility to safeguard any passwords, ID numbers, or other special access features associated with your use of the Service(s). Any transmission of information is at your own risk.

If you have any questions about security on our Site or Services, or if you become aware of [*any unauthorized use of an account, loss of your account credentials,*] or suspect a security breach, notify us immediately via email at [legal@bellavitaclinics.com](mailto:legal@bellavitaclinics.com). If our security system is breached, we will notify you of the breach to the extent required under applicable law.

## **6. Information Retention**

We retain the Personal Information we receive as described in this Privacy Policy for as long as you use our Site or Services or as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## **7. Links to Third Party Sites**

The Site or Services may contain links to other sites that are not operated by us. If you click on a link to another site, you will be directed to that third party's site. Such links do not constitute an endorsement by us of those other websites, their content or services, or the persons or entities associated with those websites. This Privacy Policy does not apply to third-party websites. We have no control over, and

assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services. We encourage you to review the privacy policies and terms of all third-party websites or services that you may visit.

**8. Children’s Privacy**

We do not sell products or services for purchase by anyone under the age of eighteen (18). Additionally, in accordance with the Children’s Online Privacy Protection Act (“COPPA”), we will never knowingly request or solicit Personal Information from anyone under the age of thirteen (13) without verifiable parental consent. In the event that we receive actual knowledge that we have collected such Personal Information without the requisite and verifiable parental consent, we will delete that information from our database as quickly as is practical. We reserve the right to request proof of age at any stage so that we can verify that minors are not using the Service(s).

**9. Your California Privacy Rights**

California Civil Code Section 1798.83 permits California residents to request and obtain a list of what Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. Under Section 1798.83, California residents are entitled to request and obtain such information, by e-mailing a request to [legal@bellavitaclinics.com](mailto:legal@bellavitaclinics.com). For more information regarding your privacy rights as a California resident, please contact us.

**10. Changes in the Privacy Policy**

We reserve the right to modify and update this Privacy Policy at any time by posting an amended version of the statement on our Site. Please refer to this policy regularly. If at any time we decide to use Personal Information in a manner different from that stated at the time it was collected, we will notify you either on the panel home page of our Site or via e-mail.

**11. How to Contact Us**

If you have any questions or comments about our Privacy Policy, please contact us at:

By e-mail: [legal@bellavitaclinics.com](mailto:legal@bellavitaclinics.com)

By telephone: (760) 284-8300

By regular mail: BELLAVITA TC 72650 FRED WARING DRIVE STE 206, PALM DESERT, CA 92260