

# **Luminary Chiropractic Privacy Policy**

This Privacy Policy explains when it applies, how we use and do not use your information, and how we keep it safe.

## **Definition of Personal Data**

In this Privacy Policy, "Personal Data" refers to any information that directly or indirectly relates to, describes, or could be used to identify an individual. Personal Data does not include anonymous or de-identified data that cannot be linked to or identify an individual.

## **1. When this Privacy Policy Applies**

This Privacy Policy covers the Personal Data shared when you use our Products and Services and to any digital, paper, and in-person communications to which this Privacy Policy is linked. This Privacy Policy applies to you and anyone who uses our Products or Services under your account.

Please note, our Privacy Policy does not cover Personal Data handling as an employee, intern, consultant, contractor, or applicant of Luminary Chiropractic. It also does not cover information collected by third-party sites or applications that may link to or be accessible from our websites. YOU are responsible for making sure all users under your account understand and agree to our Privacy Policy.

## **2. How we Collect Your Information**

We collect your information in 3 ways:

- i. You give it to us when you make a purchase, set up an account or otherwise directly communicate with us.
  
- ii. We automatically get it when you use, or your device uses, our products and/or services. For example, we use network tools to collect information like call and text records and the web browsing information we describe in this Privacy Policy.
  
- iii. We get it from outside sources like credit reports, marketing mailing lists, and commercially available geographic and demographic information, along with other available information, such as public posts to social networking sites.

## **3. Personal Data We Collect**

We collect the following categories of Personal Data:

- **Identifiers:** This includes your full name, address, email, company name, company website, telephone number, caller ID information, unique personal identifier, online identifier, Internet Protocol ("IP") address, and proof of address and ID of end users (if required by regulations).
  
- **Account Payment Information:** This includes your credit/debit card number, signature, and bank wire transfer information.

- **Commercial Information:** This includes records of products or services purchased, obtained, or considered, as well as other purchasing or consuming histories or tendencies.
- **Internet or Similar Network Activity:** This includes your browsing and search history, information on your interaction with our websites and advertisements, and information about communications delivered via our platform.
- **Metadata:** This includes information about communications delivered via our platform, such as source and destination information, IP address, completion status, time, and duration of use.
- **Geolocation Data:** This includes source and destination information about communications delivered when you use our products or services, as well as real-time location information for emergency services.
- **Cookies and Other Technologies:** We use website cookies and similar technologies to distinguish you from other visitors and gather information about the usage of our websites. For more information, please refer to the "Cookies and other tracking technologies" section.
- **Sensory Data:** This includes interactions with our sales and customer support teams, which may be recorded for quality assurance, training, and analysis purposes (subject to your consent if required by applicable law). When you use our products or services, it may also include text-to-speech transcriptions, DTMF tones, and media in your voice calls and text messages.

#### 4. How We Use Your Personal Data

We use the Personal Data we collect for the following purposes:

- To provide our products and services and fulfill your requests.
- To respond to inquiries and address concerns.
- To enable communication via our platforms and bill for services.
- To inform you about additional features, products and services.
- To inform you about system updates, upgrades, service status and outages.
- To personalize your website experience and deliver relevant content and marketing communications.

- To maintain the safety, security, and integrity of our website, services, and technology.
- For testing, research, development, analysis, and product improvement.
- To comply with legal obligations, protect our rights, and ensure security and safety.

## 5. Sharing your Personal Data

We may disclose your Personal Data to third parties for business purposes, including:

- Service providers who perform necessary services directly to Luminary Chiropractic.
- Our subsidiaries, and ultimate holding company.
- Other entities for emergency response, legal compliance, identity verification, or directory assistance.
- To enforce agreements, protect our business and customers, or respond to legal requests.

## 6. Data Subject Rights

You possess certain rights regarding the processing of your Personal Data according to applicable data protection laws. This section outlines these rights and provides information on how to exercise them. However, these laws may have limitations or exceptions that apply to these rights. We have provided a general description of these rights without specifying all applicable jurisdictions, limitations, or exceptions. When you make a request to exercise any of these rights, we can provide more detailed information about specific exceptions or limitations that may apply.

- **Right to Know:** You have the right to ask us to confirm whether we process your Personal Data, including the categories of Personal Data we collect, the sources from which we collect it, the purposes for collecting your Personal Data, the categories of third parties with whom we share your Personal Data, and the specific pieces of Personal Data we have collected about you.
- **Right to Access:** You have the right to request a copy of your Personal Data and supplementary information.
- **Right to Correction/Rectification:** You have the right to request the correction of any inaccurate information and completion of any incomplete information we hold about you.
- **Right to Erasure/Deletion:** You have the right to request the erasure or deletion of your Personal Data under certain circumstances, subject to certain exceptions.

- Right to Restriction of Processing: You have the right to request the restriction of processing your Personal Data under certain circumstances.
- Right to Data Portability: You have the right to receive your Personal Data that you have provided to us in a structured, commonly used, and machine-readable format. This enables you to transmit the data to another controller without hindrance. You may also request us to transmit this data directly to another controller.
- Right to Withdraw Consent: If we process your Personal Data based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- Right to Object to Processing: You have the right to object to the processing of your Personal Data under certain circumstances.
- Right to opt Out of Processing, "Sale," or Sharing of Personal Data for Targeted or Cross-Context Behavioral Advertising: You have the right to opt out of our processing, "sale" (as defined in the California Consumer Privacy Act) or sharing of your Personal Data for targeted, or cross-context behavioral advertising. This includes displaying advertising to you based on Personal Data obtained or inferred from your activities across various websites, applications, and other online services that we do not operate. To exercise this right, you can visit our Cookie Preferences to disable targeting cookies, as explained in the Cookies section above. You can also opt out of processing or sharing your Personal Data for targeted or cross-context behavioral advertising using an opt-out preference signal such as Global Privacy Control for a seamless experience. For more details on implementing these settings and other advertising preferences, please refer to the Cookies section above. Please note that even if you opt out of allowing us to use or disclose your Personal Data for targeted or cross-context behavioral advertising, you may still encounter our ads on other websites, applications, and online services, and aspects of our advertising may still be based on your interactions with us and our websites.
- Non-Retaliation: You have the right not to receive discriminatory treatment for exercising the rights described above.
- Making a Request; Requests by Others on Your Behalf: Only someone legally authorized to act on your company's behalf, including an authorized agent, may make a verifiable request related to any personal or company data using the methods described above. If we cannot comply with a request, we will provide an explanation for the refusal, if applicable.

## 7. Fees

Accessing your Personal Data or exercising any of your rights will not incur a fee. However, if your request is clearly unfounded, repetitive, or excessive, we may charge a reasonable fee or refuse to comply with your request in such circumstances.

#### 8. Information We May Need from You

To confirm your identity and ensure your right to access your Personal Data or exercise your other rights, we may need to request specific information from you. This may include your first and last name, email address, mailing address, telephone number, or other necessary information to verify your identity or the authorization of your representative. This is a security measure to prevent unauthorized disclosure of Personal Data. We may also contact you to request further information related to your request for assistance in our response. Any Personal Data provided for verification and fraud prevention will only be used for that purpose and will be deleted as soon as practical after processing your request.

#### 9. Timing

We strive to respond to all legitimate requests within fourteen (14) days of receipt. However, if your request is particularly complex or if multiple requests have been made, it may take longer to process. In such cases, we will notify you and keep you updated on the progress.

#### 10. Appeals

If we refuse to act on your request, you have the right to appeal that decision. You can contact Luminary Chiropractic at (843) 608-1006. We appreciate the opportunity to address your concerns before you escalate the matter to a relevant data protection supervisory authority.

#### 11. Retention of Personal Data

We will retain your Personal Data only for as long as reasonably necessary to fulfill the purposes for which it was collected, including legal, regulatory, tax, accounting, reporting requirements or as specifically outlined in this document. If there is a complaint or a prospect of litigation regarding our relationship with you, we may retain your Personal Data for a longer period. The retention period is determined based on factors such as the amount, nature, and sensitivity of the Personal Data, the potential risk of unauthorized use or disclosure, the purposes of processing, alternative means to achieve those purposes, and applicable legal requirements. After the applicable retention periods expire, your Personal Data will be deleted or anonymized. In cases where technical limitations prevent the complete deletion of Personal Data from our systems, appropriate measures will be implemented to prevent further use of such data. We may also aggregate your Personal Data (so that it is no longer personally identifiable) to improve our products and services, and in such cases, we may use the information indefinitely without further notice to you.

#### 12. Protection of Personal Data

Luminary Chiropractic takes precautions, including administrative, technical, and physical measures, to protect against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to the Personal Data we process or use. However, it is important to note that no provider can guarantee absolute security, especially when services rely on the public

internet or involve transmission through interconnected telecommunications networks. You are responsible for safeguarding your account passwords, limiting device access, and signing out of websites after your sessions.

### 13. Linked/Mirrored Websites, Landing Pages & Third-Party Websites

For your convenience, our websites may transfer you to another website that mirrors our main website or provide a link to a landing page that is controlled by Luminary Chiropractic. In these instances, our Privacy Policy applies. When we provide you with any hyperlinks to third-party websites, we are not responsible for their privacy practices or companies that we do not own or control. This Privacy Policy does not apply in these instances, and they may collect additional information beyond what we collect on our websites. We do not endorse these third-party sites, their services or products, or the content they contain. We encourage you to review the privacy policy of each third-party site you visit to understand how they collect, use, and protect your information.

### 14. Children

Our websites, products, and services are not directed to children under the age of 18 in the United States and we do not knowingly collect online Personal Data directly from children. If you are a parent or guardian and believe that your minor child has disclosed Personal Data to us, please contact Luminary Chiropractic at (843) 608-1006.

### 15. Changes to this Privacy Policy

We reserve the right to make corrections or updates to this Privacy Policy at our discretion. When changes occur, we will post the updated Privacy Policy on our website and update the Effective Date. In case of material changes, we will provide a prominent notice at the top of the Privacy Policy for thirty (30) days and/or send a notice to the email address you have provided us. We encourage you to periodically review this Privacy Policy.

### 16. General Questions

If you have any questions, concerns, or inquiries about this Privacy Policy, please contact Luminary Chiropractic at (843) 608-1006.