**Privacy Policy**

At Jadeleen Medical Solutions, Inc doing business as (DBA) HimandHair, we take your privacy seriously. This Privacy Policy explains how we access, use and share your personal data. By accessing or using our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you consent to our collection, use and sharing of your information as described in this Privacy Policy.

Your use of Jadeleen Medical Solutions, Inc Services is subject at all times to our TERMS OF USE, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions assigned in the Terms of Use.

**What this Privacy Policy Covers**

This Privacy Policy covers how Jadeleen Medical Solutions, Inc may access, use and share your Personal Data when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations.

This Privacy Policy does **not** cover the practices of third parties and/or companies that Jadeleen Medical Solutions, Inc doesn’t own or control or people we don’t manage. This Privacy Policy also does **not** cover Protected Health Information (as defined by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and HIPAA Privacy Rule) collected by the Practice (as defined herein) and providers with whom Jadeleen Medical Solutions, Inc contracts to facilitate medical visits through the Jadeleen Medical Solutions, Inc platform. Jadeleen Medical Solutions, Inc currently contracts with these medical groups (the “Practice”), however, the medical groups we contract with may change from time to time. The Jadeleen Medical Solutions, Inc Notice of Privacy Practices describes how Jadeleen Medical Solutions, Inc and the Practice may use and disclose your Protected Health Information. If you do not agree to those terms, which are available on this website, you should not access or use Jadeleen Medical Solutions, Inc services.

**Personal Data**

***Categories of Personal Data We Collect***

This chart details the categories of Personal Data that we collect



***Categories of Sources of Personal Data***

We may collect Personal Data about you from the following categories of sources:

1. **You**

When you provide information directly to us by:

* creating an account or use our interactive tools and Services.
* linking your activity tracker or wireless-enabled wearable technology device (such as a Fitbit or Apple watch) to the Services to track metrics such as sleep minutes per day.
* providing information in free-form text boxes through the Services or through responses to surveys or questionnaires.
* sending us an email or other electronic message.

When you use the Services and information is collected automatically:

* through Cookies (as defined in the “Tracking Tools, Advertising and Opt-Out” section below).
* if you use a location-enabled browser, we may receive information about your location.
* if you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device to provide you with Services, such as information about when you are logged on and available to receive updates or alert notices.

2. **Third Parties**

*Vendors*

* We may use analytics providers to analyze how you interact and engage with the Services.
* We may use third parties to help us provide you with customer support.
* We may use vendors to obtain information to generate leads and create user profiles.

*Employers*

* If your employer makes the Services available to you as a benefit of employment, we may receive certain information from them about you to enable your account and/or facilitate provision of or payment for the Services.

*Affiliates*

* We may receive information about your participation in the Services from our affiliates, such as professional health care providers, dietitians, or nutritionists (including the Practice and Providers).

*Advertising Partners*

* We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.

*Social Networks*

* If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

**Our Commercial or Business Purposes for Collecting Personal Data**

**Providing, Customizing and Improving the Services**

* Creating and managing your account or other user profiles.
* Processing orders or other transactions; billing.
* Providing you with the products, services or information you request.
* Meeting or fulfilling the reason you provided the information to us.
* Providing support and assistance for the Services.
* Improving the Services, including testing, research, internal analytics and product development.
* Personalizing the Services, website content and communications based on your preferences.
* Doing fraud protection, security and debugging.
* Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).

**Marketing the Services**

* Marketing and selling the Services.
* Showing you advertisements, including interest-based or online behavioral advertising.

**Corresponding with You**

* Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Calibrate or the Services.
* Sending emails and other communications according to your preferences or that display content that we think will interest you.

**Meeting Legal Requirements and Enforcing Legal Terms**

* Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
* Protecting the rights, property or safety of you, Jadeleen Medical Solutions, Inc or another party.
* Enforcing any agreements with you.
* Responding to claims that any posting or other content violates third-party rights.
* Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without updating this policy.

**How We Share Your Personal Data**

We may disclose your Personal Data to the categories of service providers and other parties described in this section. Depending on applicable state law, some of these disclosures may constitute a “sale” of your Personal Data. Additional information is provided in the state-specific sections below.

**Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:

* Hosting, technology and communication (including email) providers.
* Security and fraud prevention consultants.
* Support and customer service vendors.
* Product fulfillment and delivery providers.
* Data analytics providers.
* Payment processors. Our payment processing partner Stripe, Inc. (“Stripe”) collects your voluntarily-provided payment card information necessary to process your payment. Please see Stripe’s terms of service and privacy policy for information on its use and storage of your Personal Data.

**Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:

* Ad networks.
* Marketing providers.

**Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:

* Companies that track how users found or were referred to the Services.
* Companies that track how users interact with the Services.

**Business Partners.** These parties partner with us in offering various services. They include:

* Businesses that you have a relationship with.
* Companies that we partner with to offer joint promotional offers or opportunities.

**Parties You Authorize, Access or Authenticate.**

* Third parties you access through the services.
* Social media services.
* Other users.

*Legal Obligations*

We may share any Personal Data we collect with third parties to assist in “Meeting Legal Requirements and Enforcing Legal Terms” as described in “Our Commercial or Business Purposes for Collecting Personal Data” above.

*Business Transfers*

All your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should such an event occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

*Data that is Not Personal Data*

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

**Tracking Tools, Advertising and Opt-Out**

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

* Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
* Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you and remember your preferences (for example, your choice of language or region).
* Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google LLC (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy\_ads.html or the Google Analytics Opt-out Browser Add-on at [**https://tools.google.com/dlpage/gaoptout/**](https://tools.google.com/dlpage/gaoptout/).
* Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit [**https://www.allaboutcookies.org/**](https://www.allaboutcookies.org/).

*Information about Interest-Based Advertisements:*

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based on a consumer’s online behavior across different websites and properties. To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA’s or NAI’s consumer opt-out pages, at http://www.networkadvertising.org/choices/ or www.aboutads.info/choices.

**Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure by using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

**Personal Data of Children**

Jadeleen Medical Solutions, Inc  **Services are only available to individuals age 18 or older** and we do not knowingly collect or solicit Personal Data about children under 13 years of age. If you are a child under the age of 13, do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as soon as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, contact us at [info@himandhair.com](info%40himandhair.com%20)

**California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [info@himandhair.com](info%40himandhair.com%20)

*Access*

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

* The categories of Personal Data that we have collected about you.
* The categories of sources from which that Personal Data was collected.
* The business or commercial purpose for collecting or selling your Personal Data.
* The categories of third parties with whom we have shared your Personal Data.
* The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

*Deletion*

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or to complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

*Exercising Your Rights*

To exercise the rights described above, you or your Authorized Agent (as defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (first and last name and email address and you may be asked to provide your telephone number or address), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request by emailing us at [info@himandhair.com](info%40himandhair.com%C2%A0)or sending a request to Privacy at Jadeleen Medical Solutions, INC, 14175 West Indian School Rd, Suite B496, Goodyear, AZ 85395

Your Authorized Agent may exercise your rights on your behalf. We may request a copy of such Authorized Agent’s written permission or authority when they make a request on your behalf.

*Personal Data Sales Opt-Out and Opt-In*

Jadeleen Medical Solutions, Inc does not receive remuneration from third parties for your Personal Data and has not over the last 12 months. To our knowledge, we do not sell any Personal Data of minors under 16 years of age.

*We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA*

We will not discriminate against you for exercising your rights under this Privacy Policy, the CCPA, or other applicable law. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under this Privacy Policy, the CCPA or other applicable law. However, we may offer different tiers of Services as permitted by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

**Other State Law Privacy Rights**

*California Resident Rights*

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at [info@himandhair.com](info%40himandhair.com%20)

*Nevada Resident Rights*

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at [info@himandhair.com](info%40himandhair.com) with the subject line “Nevada Do Not Sell Request” and providing us with your full name and the email address associated with your account.

*Connecticut, Colorado, Utah and Virginia Resident Rights*

If you are a resident of Connecticut, Colorado, Utah or Virginia, you may have the right to opt-out of the sale of certain Personal Data to certain third parties. You can exercise this right by contacting us at [info@himandhair.com](info%40himandhair.com%C2%A0)with the subject line “Do Not Sell Request” and providing us with your state of residence, full name and the email address associated with your account.

**Changes to this Privacy Policy**

We may update this Privacy Policy from time to time; when we do, we will post the updated Privacy Policy on the HimAndHair website. Please check the revision date at the top of this Privacy Policy to see if it has been updated since you last reviewed it. The updated Privacy Policy will be effective immediately upon posting on the HimAndHair website; if you continue to use the Services after the Privacy Policy has been updated, that means you agree to all of the changes. If you object to any update of the Privacy Policy, your sole recourse is to stop using the Services.

**Contact Information**

If you have any questions about this Privacy Policy, the ways in which we collect and use your Personal Data, and/or your choices and rights regarding such collection and use, please email [info@himandhair.com](info%40himandhair.com%C2%A0)or contact us at Privacy at Jadeleen Medical Solutions Inc, 14175 West Indian School Rd, Suite B496, Goodyear, AZ 85395