



PRIVACY POLICY

Last Updated: September 2021

Lyfebulb Holdings Inc., a Delaware corporation, (“Lyfebulb” or “we,” “our” or “us”) has prepared this Privacy Policy (“Policy”) to describe our practices regarding the personal information that we collect, use, and share through the IBDLyfe platform either through our website at www.IBDlyfe.com (the “Site”) or through our mobile application (“App”) (together, the Site and App are the “IBDLyfe Platform”). Capitalized terms not defined in this Policy shall have the meanings given to them in our [Terms of Use](#).

By using the IBDLyfe Platform you are consenting to the collection, use, and disclosure of your Personal Information as set forth in this Policy. If you do not agree to be bound by this Policy, you may not access or use the IBDLyfe Platform.

Lyfebulb is located in the United States of America and all information collected through the IBDLyfe Platform will be collected in or transferred to the United States of America. By using the IBDLyfe Platform, you consent to and authorize the export of your information to the United States and its storage and use as specified in this Policy.

If you are located anywhere in the European Economic Area or in the United Kingdom, you understand and expressly consent as required by the General Data Protection Regulation 2016/679 (“GDPR”) and the UK Data Protection Act of 2018 (“DPA”) (together referred to as the “GDPR/DPA”) that (a) your data is transferred to and stored in the United States of America, which does not provide the same level of protection and safeguards for your data as in your own country; and (b) your data may be subject to lawful requests and access by the courts and law enforcement authorities in the United States without your knowledge or consent. You are entitled to certain rights under the GDPR/DPA, which we provide in this Privacy Policy and as specified [here](#). If you do not consent to the storage of your Personal Information in the United States, and that your information is subject to the laws of the United States, do not provide us with any of your Personal Information.

This Policy is part of the [Terms of Use](#) that govern your use of the IBDLyfe Platform.

The IBDLyfe Platform is not intended to be used by anyone under the age of 18 regardless of parental or guardian consent. **If you are younger than 18, you are not authorized to use the IBDLyfe Platform.**

This Policy may be supplemented or amended from time to time by privacy notices posted on the IBDLyfe Platform. These privacy notices provide a level of detail that we cannot provide in this more general description of our privacy practices. For example, certain pages of the IBDLyfe Platform may contain privacy notices providing details about the Personal Information we collect on those pages, why we need that information, and choices you may have about the ways we use that information.

This Policy is our general privacy notice and for California residents is intended to comply with the California Consumer Privacy Act of 2018 (CCPA). We indicate in the Policy where certain rights are unique to California residents.

1. COLLECTION OF PERSONAL INFORMATION

1.1. Personal Information. “Personal information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked to, directly or indirectly, a particular consumer or household. The following are categories of personal information we may collect about you:

Categories	Examples (without limitation)	Processing Purposes
A. Individual Identifiers and Demographic Information	Email, Password, Phone Number, Date of Birth, Age Range, Internet Protocol Address, Name and age of child, Real Name, Alias, Postal Address, Unique Personal Identifier, Online Identifier, Account Name, or other similar identifiers	<ul style="list-style-type: none"> • To Provide and Improve the IBDLyfe Platform • To set up your account (“Account”) • To Market Products or Services • To Communicate with You
B. Classifications	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> • To Set Up Your Account • To Identify Communities or Individuals of Interest to You • To Promote and Suggest Products and Services of Interest to You based on Your Background • To Invite You to Participate in Discussions or Events that match your Background • In connection with your participation in our communities
C. Commercial Information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, including information about you obtained from third parties.	<ul style="list-style-type: none"> • To Provide and Improve the IBDLyfe Platform • To Understand Your Interests • To Set Up Your Account • To Market or Promote Products or Services • To Communicate with You
D. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, and sleep, health, or exercise data.	<ul style="list-style-type: none"> • To Provide and Improve the IBDLyfe Platform • To Understand Your Interests • To Invite You to Participate in Discussions or Events • To Identify Groups or Individuals of Interest to You • To Set Up Your Account • In connection with your participation in our communities
E. Internet or Network Activity	Browsing history, search history, information on an individual’s interaction with a website, application, or advertisement. Network and device related information. Social media integration.	<ul style="list-style-type: none"> • To Improve the IBDLyfe Platform • To Market Products or Services • To Secure the IBDLyfe Platform • To Understand Your Interests
F. Geolocation Information	Specific location data of individuals who consent to providing such data	<ul style="list-style-type: none"> • To Improve the IBDLyfe Platform • To Market Products or Services • To Understand Your Interests • To Communicate with you

G. Inferences Drawn from Personal Information	Profile reflecting your preferred communities and interests, health history, purchasing or consuming characteristics.	<ul style="list-style-type: none"> • To Improve the IBDLyfe Platform • To Market Products or Services • To Understand Your Interests • To Communicate with You
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Personal Information does not include:

- Publicly Available - Publicly available information from federal, state, or local government records.
- Deidentified or Aggregate information – “**Deidentified Information**” means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular individual, and for which we have implemented technical safeguards and business processes that prohibit reidentification of the individual. “**Aggregate Information**” means information that relates to a group or category of individuals, from which individual identities have been removed, that is not linked or reasonably linkable to any individual or household, including via a device. We may use Deidentified Information and Aggregate Information for any legal purpose, including without limitation for any purpose for which we use Personal Information.
- Excluded Information – Certain laws require separate privacy notices or are exempt from general Personal Information privacy policy disclosure requirements. Such laws include the Fair Credit Reporting Act (FRCA); and the Driver’s Privacy Protection Act of 1994. We will notify you separately according to those laws if any of our collection, use, or sharing of Personal Information falls under any of those laws.

1.2. Sources of Personal Information. We obtain the categories of Personal Information listed above on or through the IBDLyfe Platform and from the following categories of sources:

- Personal Information You Provide. We collect Personal Information when you voluntarily submit it to us. For example, we may collect or receive Personal Information from a user that creates an Account; provides information to us in person or on or through our website or mobile app; signs up to receive any of our communications; participates in one of our surveys or events; provides information in any User Posting; submits a request to our customer service team; interacts with our social media pages; or otherwise interacts with us or other users or members, or any of our advertisers or third party service or product providers through the IBDLyfe Platform.
- Automatically Collected Personal Information. In addition to Personal Information that we may receive directly from you, we indirectly collect other information from you automatically through the IBDLyfe Platform. For example, we receive Personal Information from you when you visit and navigate the IBDLyfe Platform on any device. We may also collect Personal Information about you over time and across different websites, apps, and devices when you accesses the IBDLyfe Platform. We may collect information about your precise or approximate location as determined through data such as your IP address or mobile device’s GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device’s settings menu. We may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions. We also collect some Personal Information automatically using cookies or other online tracking technologies as described in [Cookies and Other Technology](#) below.
- Personal Information Obtained from Third Parties. In addition to the Personal Information that we collect from you directly and automatically, we may receive Personal Information about you from other third-party sources. For example, we may receive Personal Information from our business partners, our advertisers or sponsors, or companies that provide Personal Information to supplement what we already know about you. We may obtain geolocation data from third parties. We may merge or combine such Personal Information with the Personal Information we collect from you directly or automatically.

2. USE OF PERSONAL INFORMATION

Our primary purpose in collecting Personal Information is to provide the functionality offered through the IBDLyfe Platform. In addition to that purpose, we may also use Personal Information for the following purposes:

- To Use the IBDLyfe Platform. To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to register as a member in one of our communities, we will use that Personal Information to register you and to engage you in the community. If you input your personal data into the Journal, you may use this data for your personal record keeping / review and to share this data with your health care practitioner; however, you maintain the Journal and transmit your health information at your own risk. We do not guarantee that the data in the Journal is secure or encrypted and we provide no assurances that transmissions of data to and from the IBDLyfe Platform will be encrypted.
- To Provide Special Services. If you provide your Personal Information to request a special service like event reservation or requesting information relating to your interests, we will use such information to assist you. We may also save your Personal Information to facilitate future requests.
- To Improve the IBDLyfe Platform. We use Personal Information to understand and analyze the usage trends and preferences of our users to make the IBDLyfe Platform and content better, diagnose technical issues, prevent fraud, deliver promotions and recommendations more efficiently, refine our services offerings, and develop new features and functionality.
- To Understand Your Interests. We use your Personal Information to personalize your experience on the platform, and to deliver information relevant to your interests.
- To Provide Research Resources. We may analyze your Personal Information in combination with other users' information to draw conclusions relating to health and well-being. We will not share any of your Personal Information for any research purposes without your express consent.
- To Respond to Your Requests or Questions. We use Personal Information to provide you with support and to respond to your requests for customer support, including to investigate and address your concerns and monitor and improve our responses. This may also include responding to your feedback.
- To Set Up Your Account. If you set up an Account we will use the registration information you provide in relation to that Account creation to create, maintain, customize, and secure your Account, and may include information about you gathered from third party sources such as from your other social media accounts.
- To Market Products or Services. We use your Personal Information to provide you with information about our and third party products, services, or promotions. For example, we may use cookies or other online tracking technologies to provide customized advertisements, content, and information; to monitor and analyze the effectiveness of marketing activities; and to track your entries, submissions, and status in any promotions. These might be third party offers we think you might find interesting. These communications may come in the form of interest-based advertising using information gathered across multiple websites, devices, or other services.
- To Secure the Platform. We use Personal Information to maintain the safety, security, and integrity of the platform, databases and other technology assets, business, and other users.
- To Communicate with You. We communicate with you about your Account or our relationship. We may also contact you about this Policy or the Terms of Use.
- As Required by Law. We use Personal Information to respond to requests from law enforcement and as required by applicable law, court order, or government investigation.

3. SHARING OF PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this Policy, we may share your Personal Information in the following circumstances:

- 3.1. Related Companies and M&A Transactions.** We may share your Personal Information with companies that are affiliated with us (that is, that control, are controlled by, or are under common control with us). In addition, if we sell all or part of our business or make a sale or transfer of assets or are otherwise involved in a merger or business transfer, we may transfer your Personal Information to a third party as part of that transaction.
- 3.2. Consent.** We may ask if you would like us to share your Personal Information with other unaffiliated third parties who are not described elsewhere in this policy, and we may do so only with your consent.
- 3.3. Legal Compliance.** We may disclose Personal Information in response to subpoenas, warrants, or court orders, in connection with any legal process, or to comply with relevant laws. We may also share your Personal Information in order to establish or exercise our rights; to defend against a legal claim; to investigate, prevent, or take action regarding possible illegal activities or fraud; to protect the safety and security of other users; or to prevent a violation of our Terms of Use.
- 3.4. Service Providers.** We may share your Personal Information with third parties who perform services on our behalf that are necessary for the orderly operation of the platform. For example, we use a third party to host the platform. Among other things service providers may help us perform website or application hosting, app design, maintenance services, database management and/or analytics, web analytics, app analytics, SMS notifications, payment processing, fraud protection, marketing, or any other use set out in this Policy. Access to your Personal Information by these service providers is limited to the information reasonably necessary for the service provider to perform its limited function.
- 3.5. Behavioral-Based Advertising.** We may participate in behavioral-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of the IBDLyfe Platform so that we can provide advertising about products and services tailored to your interest. That advertising may appear either on the IBDLyfe Platform or on other websites. Please see [Cookies and Other Technology](#) below for more information and instructions on ways to opt-out or limit our collection of this information.
- 3.6. Affiliated Offerings.** We may jointly offer events, promotions, or any other product or service offerings with our network of affiliated companies or our sponsors. The Personal Information that you submit through an event, promotion, or other product or service offering offered by any of our network of affiliated companies or sponsors may be combined and transmitted with the registration information related to your Account. Third party partners may collect information directly from you, which may be combined with Personal Information disclosed by us. If you decide to request, enter into, or participate in an event, promotion, or other product or service offering that is offered by us and identified as a joint effort with another party, the information that you provide may be shared with us and with that identified third party.
- 3.7. Aggregate Information.** We may share or sell Aggregate Information and other anonymized or deidentified information for regulatory compliance, industry and market analysis, research, demographic profiling, marketing and advertising, and other business purposes.

4. SECURITY OF PERSONAL INFORMATION

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your Personal Information from the risks presented by unauthorized access or acquisition, we cannot guarantee the security of your Personal Information. In the event that we are required by law to inform you of any unauthorized access or acquisition of your Personal Information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

5. COOKIES AND OTHER TECHNOLOGY

“**Cookies**” are small pieces of information that a website stores on your device while you are viewing a Service. We may use both session cookies (which expire once you close your web browser) and persistent cookies (most of which have an expiration date, based on the purpose of the cookie, at which point they self-delete) to provide you with a more personal and interactive experience on our Services. We place three kinds of cookies: essential, advertising, and performance/analytics.

5.1 Essential Cookies

These cookies are strictly necessary to provide you with the IBDLyfe Platform and to use some of its features, such as access to secure areas. Because these cookies are strictly necessary to deliver the platform, you cannot refuse them without impacting how the platform functions. One of our software's fundamental principles is not collecting or storing personal information that isn't central to the platform's functionality, and that extends to our use of cookies.

<u>Cookie</u>	<u>What it collects</u>	<u>When it's set</u>	<u>Persistent/Session</u>
%-tk (Essential)	This token is anonymous and is used for CSRF protection. Cannot be opted out of.	Page Load	Persistent
%-Vv (Performance)	This token is anonymous and is used to track visits. Cannot be opted out of	Page Load	Persistent or Session
%-vA (Essential)	This token is used for Analytics tracking. EU users have their data anonymized by default. We store several pieces of information on this single cookie: Privacy Mode - A numeric flag, used to determine how much we anonymize a user's data when tracking analytics. This value is automatic, based on the detected country of origin. Session ID - A randomly-generated ID used to track signed-in-user activity. This value is reset between visits to the site. Secondary Session ID - A randomly-generated ID used to track events that could include guest data (e.g. page views). UUID - A randomly-generated ID used to uniquely identify the user. This ID can persist between site visits but only lives in the user's analytics cookie.	Page Load	Persistent or Session

<u>Cookie</u>	<u>What it collects</u>	<u>When it's set</u>	<u>Persistent/Session</u>
	Cannot be opted out of -- however, sites can disable Vanilla Advanced Analytics.		
vf-%-sid (Essential)	This is a "session" cookie (sid = session ID). The value maps to a row in Vanilla's Session table. This table is used to temporarily store information for a user. More often than not, this cookie is created as part of an SSO sign-in (although it can also make an appearance when users initiate the "forgot my password" workflow). Depending on the SSO method, we might need to "remember" some initial values to complete sign-in, after the user is redirected back to the site from the authentication provider	Page Load	Session
__vnf (Essential)	<p>This the Troll Management cookie. It is not anonymous and persists after logout. It's not used by anything except the Troll Management addon. It is only initially assigned when users log in and does not apply to users who remain guests.</p> <p>This is a randomly-generated ID we use to "fingerprint" users to determine if one user is utilizing multiple accounts on a community. It is not derived from any PII.</p> <p>Cannot be opted out of -- however, sites can disable the Troll Management addon.</p>	Page Load	Persistent or Session
__cfduid (Essential)	<p>Cloudflare uses 2 cookies, both named __cfduid. These live on:</p> <p>.v-cdn.net</p> <p>These are used to identify individual clients behind a shared IP address and apply security settings on a per-client basis.</p> <p>For example, if a visitor is in a coffee shop where there may be several infected machines, but the specific visitor's machine is trusted (for example, because they completed a</p>	Page Load	Session

<u>Cookie</u>	<u>What it collects</u>	<u>When it's set</u>	<u>Persistent/Session</u>
	challenge within your Challenge Passage period), the cookie allows Cloudflare to identify that client and not challenge them again. It does not correspond to any user ID in your web application, and does not store any personally identifiable information.		
__cfuid – (Essential)	Another Cloudflare cookie related to rate limiting Basically, it makes sure that different users on the same network (sharing the same IP) doing requests to rate-limited URLs won't be counted as one user in order to avoid rate limiting issues.	Page Load	Session

5.2 Non-Essential Cookies

We use two kinds of non-essential cookies: performance and advertising. You may opt out of non-essential cookies using the cookie banner on the IBDLyfe Platform. Alternatively, you may set your web browser to block cookies; however, this may interfere with some non-essential functionality through the IBDLyfe Platform, such as automatically remembering your login information and also see “Opting Out” below.

Non-essential performance cookies help us analyze how the platform is being accessed and used, enable us to track performance, and secure the platform. For example, we use those cookies to get insights regarding users and performance, such as page speed or to help us customize the platform for you in order to enhance your experience.

Non-essential advertising cookies are used to make advertising messages more relevant to you and your interests. We sometimes use cookies delivered by third parties to track the performance of our advertisements. For example, these cookies remember which browsers have visited the platform. The information provided to third parties does not include Personal Information, but this information may be re-associated with Personal Information after we receive it. This process helps us manage and track the effectiveness of our marketing efforts.

<u>Cookie</u>	<u>What it collects</u>	<u>When it's set</u>	<u>Persistent/Session</u>
Google Tag Manager (Essential)	It provides measurement codes and related code fragments collectively known as tags on the platform.	Page Load	Persistent
Google Analytics (Performance)	It collects data on a user's device, browser, location and ad campaign information. It also records behavior on the web, leading up to visiting the site and on the platform.	Page Load	Persistent or Session

<u>Cookie</u>	<u>What it collects</u>	<u>When it's set</u>	<u>Persistent/Session</u>
FullStory (Performance)	Analytics data about platform usage.	Page Load	Session

We generally use cookies and similar technologies as follows:

- for “essential” or “functional” purposes, such as to enable various features of the platform like remembering passwords or staying logged in during your session;
- for analytics purposes, consistent with our legitimate interests in how the platform is used or performs, how users engage with and navigate through the platform, what sites users visit before visiting the platform, how often they visit the platform, whether an email was received or opened, and other similar information; and
- subject to any consent required by law, for the purpose of displaying advertisements via retargeting to those users who have visited the platform, or for targeting advertising to visitors to the platform

If you'd like to remove or disable cookies via your browser, refer to your browser's configuration.

6. OPTING OUT

You can make the following choices to opt out of certain activities regarding your Personal Information:

- 6.1. Promotional E-mails.** You may choose to provide us with your e-mail address for the purpose of allowing us to send newsletters, surveys, offers, and other promotional materials related to our sponsors and your interests, as well as targeted offers from third parties. You can stop receiving promotional e-mails by clicking the “unsubscribe” links in the e-mails or by contacting us as described below. If you decide not to receive promotional e-mails, we may still send you service-related communications, such as those about your Account, to answer inquiries, or deliver notifications directly to you through the IBDLyfe Platform.
- 6.2. Behavioral Advertising.** We may participate in behavioral-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of the IBDLyfe Platform so that we can provide advertising about products and services tailored to your interest. That advertising may appear either on the platform, or on other websites. If you wish to limit third parties' collection of information about your use of the platform, you can opt-out of such at the [Digital Advertising Alliance](#) or [Network Advertising Initiative](#). PLEASE NOTE THAT OPTING-OUT OF BEHAVIORAL ADVERTISING DOES NOT MEAN THAT YOU WILL NOT RECEIVE ADVERTISING WHILE USING THE SERVICE. IT WILL, HOWEVER, EXCLUDE YOU FROM INTEREST-BASED ADVERTISING CONDUCTED THROUGH PARTICIPATING NETWORKS, AS PROVIDED BY THEIR POLICIES AND CHOICE MECHANISMS.
- 6.3. Do-Not-Track.** Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time we do not modify your experience based upon whether such a signal is broadcast.

7. ACCESSIBILITY.

We have worked to develop the IBDLyfe Platform to conform to the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.0. These guidelines explain how to make web content more accessible for people with disabilities.

8. CONTACT US

If you wish to access, update, or correct your Personal Information, please contact us using the information provided below. We will respond to you within a reasonable time and, in any case, within the time limits established by applicable law. We may ask you for additional information to verify your identity. If you have any questions or concerns about our Policy or any other privacy or security issue, please contact us at:

Lyfebulb Holdings Inc.
c/o Cohen & Curtin LLP
67 Mason Street, 2nd Floor
Greenwich, CT 06830
Pat@lyfebulb.com
Toll-Free Number: 888-922-7228

9. RIGHTS AND CHOICES FOR CALIFORNIA RESIDENTS

The following parts of this Privacy Notice are for only for the benefit of California consumers pursuant to (and as defined in) the California Consumer Privacy Act (“CCPA”):

9.1. Categories of Personal Information Disclosed for a Business Purpose or Valuable Consideration. We must disclose whether the following categories of Personal Information are disclosed for a “business purpose” or “valuable consideration” as those terms are defined under California law. Note that while a category below may be marked, that does not necessarily mean that we have Personal Information in that category about you. In the past twelve months, we have disclosed the following categories of Personal Information in the manner described.

Category	Information is Disclosed for a Business Purpose	Information is Disclosed for Valuable Consideration
A. Individual Identifiers and Demographic Information	Yes	No
B. Classifications	Yes	No
C. Commercial Information	Yes	No
D. Biometric Information	Yes	No
E. Internet or Network Activity	Yes	No
F. Geolocation Information	Yes	No
G. Inferences Drawn from Personal Information	Yes	No

9.2. Your Rights. If you are a consumer as defined by the CCPA, you have certain rights in relation to your Personal Information under the CCPA. Under the CCPA, you have the following additional rights:

- **Access to Your Personal Information and Portability.** You may request access to your Personal Information by contacting us as described below. We will grant you reasonable access to the data that we have about you as required by law. You may also be entitled to request copies of Personal Information that you have provided to us in a structured,

commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

- **Changes to Your Personal Information.** We rely on you to update and correct the Personal Information contained in your Account or contacting us as described below. Note that we may keep historical information in our backup files as permitted by law. If the IBDLyfe Platform does not permit you to update or correct certain Personal Information, please contact us as described below.
- **Deletion of Your Personal Information.** We retain your Personal Information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. You may, however, request that we delete your Personal Information by contacting us as described below. We will grant a request to delete information as required by law, but you should note that in many situations we must keep your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Except as provided above, we will delete, aggregate, or de-identify all of your Personal Information as described in this subsection within the timeframes required by law.

- **Right to Opt Out of Disclosure of Personal Information for Valuable Consideration.** We do not sell your Personal Information. If we do begin to sell Personal Information, we will update this Policy and enable you to submit a request through our webform.

9.3. Exercising Your CCPA Rights

When exercising the rights or options described in this Policy, the following guidelines apply:

- **No Fee Usually Required.** You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.
- **What We May Need from You.** When exercising your rights or otherwise assisting you, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure we do not disclose Personal Information to any person who is not entitled to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- **Time to Respond and Format.** We will endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an Account, we will deliver our written response to that Account. If you do not have an Account, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

9.4. No Discrimination. You will not be subject to discrimination as a result of exercising the rights described herein. In some cases, when you exercise one of your rights, we will be unable to comply with the request due to legal obligations or otherwise, or we will be unable to provide you certain products or services. These responses are not discrimination and our reasons for declining your request or ceasing services will be provided at that time.

9.5. Authorized Agent. You may designate an authorized agent to make a CCPA request on your behalf. In order to designate an authorized agent to make a CCPA request on your behalf, you must mail to us a valid power of attorney, the requester's valid government issued identification, and the authorized agent's valid government issued identification.

10. OTHER CALIFORNIA PRIVACY RIGHTS

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of the IBDLyfe Platform who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email or write to us at the information provided in [Contact Us](#).

11. EEA AND UK USERS

If you are located anywhere in the European Economic Area or in the United Kingdom, you **understand and expressly consent** as required by the General Data Protection Regulation 2016/679 ("GDPR") and the UK Data Protection Act of 2018 ("DPA") (together referred to as the "GDPR/DPA") **that (a) your data is transferred to and stored in the United States of America, which does not provide the same level of protection and safeguards for your data as in your own country; and (b) your data may be subject to lawful requests and access by the courts and law enforcement authorities in the United States without your knowledge or consent.** You are entitled to certain rights under the GDPR/DPA in addition to other rights under this Policy, which we specify in this section.

If you do not consent to the storage of your Personal Information in the United States, and that your information is subject to the laws of the United States, do not provide us with any of your Personal Information.

We will comply with the following additional rights under the GDPR/DPA, subject to its terms and conditions:

Access	You have the right to access the following additional information about your Personal Information to determine that we are processing it lawfully: (i) the purpose of the processing; (ii) the categories of Personal Information; (iii) identification of the recipients and intended recipients of the Personal Information; and (iv) our source of the Personal Information.
Data Portability	If we have your Personal Information because of a contract that we entered into with you or because you have consented to providing us your Personal Information, you may request that we provide you with a digital file of the Personal Information that you have provided to us, which includes any records we have collected from observing your digital activities. We will provide you with such digital file if and in a manner compliant with GDPR/DPA.
Updates or Corrections	Subject to our separate confirmation, you may request that we update or correct the Personal Information that we have about you.
Objection to or Restriction on Processing	If you feel that our access to or our use of your Personal Information impacts your fundamental rights or freedoms, you may object to the processing of such Personal Information or restrict the processing of such data by contacting us through the information provided under Contact Us above. In some cases, we may have legitimate grounds to process such data that may override your rights or freedoms.
Erasure/Removal	You may request that we erase your Personal Information if it is determined that we do not have a legal basis for using it, you withdraw your consent to our processing, you object to the processing and we have no overriding legitimate interest, or if required by law.
Withdrawal of Consent	If we use your Personal Information in a manner that you have previously consented to, you may withdraw your consent by contacting us through the information provided under Contact Us above.
Unsubscribe or Modify Preferences	If at any time you prefer to receive less marketing or other information from us, you may modify your preferences or unsubscribe by contacting us through the information provided under Contact Us above.
Supervisory Authority	If you believe your rights regarding your Personal Information have been breached or if a breach has been inadequately addressed, you have the right

	to report to or file a complaint with any independent public authority which is established by a European Union member state pursuant to Article 51 of the General Data Protection Regulation or as to the DPA, you may make a complaint to the Information Commissioner's Office (ICO).
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If you have further questions about your rights as summarized above, or any questions about the Personal Information that we collect and use, please do not hesitate to [Contact Us](#).