

WEBSITE PRIVACY POLICY

Last Updated and Effective as of April 15, 2026.

Please read this Privacy Policy before you use this website located at <https://www.citrinlongevity.com/> (the “**Website**”). The terms “you” or “yours” refer to the user of the Website. **Your privacy is important to Citrin Wellness Inc. dba Citrin Longevity (“Citrin Longevity”, “we,” “our,” or “us”)** the owner of the Website. This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the Website and use the contact form or AI chat feature on the Website, the ways in which we use, maintain, protect, and disclose that information, and your rights with respect to such information. **By accessing or using this Website, you consent to this Privacy Policy and the data collection practices described herein, whether or not you have read it. If you do not agree to these terms, please do not access or use the Website.**

Information submitted through the Website, including contact forms or chat features, is not intended to be, and should not be considered, protected health information (PHI) and is not subject to HIPAA protections.

This Privacy Policy applies to information we collect on and through this Website including in any electronic messages between you and the Website. **It does not apply to any information you may provide to us or that we may collect about you as a patient of Citrin Longevity.** For avoidance of doubt, if you are a patient of Citrin Longevity it does **not** apply to your personal health information. Our separate HIPAA Notice of Privacy Practices that discusses how we collect and treat health information of patients of Citrin Longevity is supplied to new patients upon registration.

In the event of any conflict between this Privacy Policy and our HIPAA Notice of Privacy Practices, the Notice of Privacy Practices will control with respect to your medical information.

Please do not submit sensitive medical information through any general website contact form.

Changes to our Privacy Policy

We may need to, and we reserve our right to, change this Privacy Policy from time to time, in which case the updated Privacy Policy will be posted on this page, and we will update the Effective Date at the top of the Privacy Policy to reflect the date of such change(s). By continuing to use the Website after we post any such changes, you accept the Privacy Policy as modified, so please check this Privacy Policy from time to time to be aware of any modifications.

Children’s Online Privacy Protection Act

This Website and any products and services offered herein are not intended for children under the age of 18. No one under age 18 may provide any personal information to or on the Website. We do not knowingly collect information from anyone under 18. If we learn we have collected or received any information from anyone under the age of 18, we will delete that information. If

you believe we might have any information from or about a child, please contact us at info@citrinlongevity.com.

Information We Collect and How We Collect It

When you access the Website, its content and its services, we will learn certain information about you during your visit. We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us.

The Website provides various places for visitors to provide information. We collect information you provide when you fill out any type of form on the Website including a contact form or use the AI chat or automated messaging features available on the Website, consent to receive marketing emails from us, or otherwise contact us via e-mail or an online form located on our Website.

The information collected may include your name, e-mail, phone number, any comments you provide, records and copies of your correspondence such as messages together with your e-mail address and our responses (collectively, “personal information”). You are not required to provide any personal information to merely access or visit the Website.

Information We Collect Through Automatic Data Collection Technology.

As you visit and navigate through the Website, we may use automatic data collection technologies such as “cookies” (small files saved on your hard drive by your web browser) like Google Analytics to collect certain nonpersonal information about your equipment, browsing actions and patterns. This nonpersonal information will generally include information about your location, your traffic pattern through our Website, and any communications between your computer and our Website. Among other things, we may collect data about your computer hardware and software, your Internet connection, your IP address, your operating system, your browser type, domain names, access dates and times, referring website addresses, and information about the areas of the Website you visit and search terms you use on this Website and about the links you may select from within this Website to other areas of the Internet. We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking) such as the websites you visited just before and just after this Website.

Any such information collected automatically is used for statistical data and will not include personal information. We use such technologies and the information collected by them to

improve the Website and our service as it enables us to analyze Website performance, estimate our audience size, track usage patterns, save information from your previous visits about your preferences to customize your experience and speed up your searches and recognize you when you return to our Website.

If we use cookies, we will ask for your consent to allow us to use cookies. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if we use cookies and you select this setting, you may be unable to access certain parts of our Website.

We also reserve the right to use technological equivalents of cookies, including social media pixels. These pixels allow social media sites to track visitors to outside websites so as to tailor advertising messages users see while visiting that social media website. We reserve the right to use these pixels in compliance with the policies of the various social media sites.

If your browser sends a "Do Not Track" signal, only a generic cookie will be placed on your device while the Website is accessed.

To the extent that you voluntarily provide personal information to us, our systems will associate the automatically collected information with your personal information.

Google Analytics

This Website may also use Google Analytics so that we can understand and analyze the usage trends and preferences of visitors in order to improve our service and develop new features and functionalities. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. To learn more about Google Analytics and how they may collect and use your data, please visit: "How Google uses data when you use our partners' sites or apps," located at:

<https://policies.google.com/technologies/partner-sites>.

You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on available here: <https://tools.google.com/dlpage/gaoptout/>. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visitors' activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

How We Use Your Information

We use information that we collect about you or that you provide to us, including information submitted through AI chat or automated messaging features, to send you e-mails when you request information from us, to respond to your comments and questions, to send you marketing when you have consented to it, to provide support to users of the Website, to

provide you with information about our services, to notify you about changes to our Website, to provide you with information you request from us, to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, in any other way we may describe when you provide the information, to provide us with an overview of how people are accessing and using this Website, to understand and analyze usage trends and preferences of our Website visitors and users so that we can improve our service and develop new products, services, features and functionalities, and to improve our Website performance and customer service.

Email Policies and CAN-SPAM Act

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease your personal information to third parties, and we will not disclose your e-mail address to any third parties except as allowed in the section of this Privacy Policy titled **Disclosure of Your Information: Who We Share Your Information With**. We will maintain the information you send via e-mail in accordance with applicable federal law.

In compliance with the CAN-SPAM Act, all e-mails sent from Citrin Longevity will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages from us provide the opportunity to opt-out of receiving future communications from us by clicking on an unsubscribe link located at the bottom of any such e-mail at any time. After unsubscribing, we will discontinue sending the messages as soon as technically feasible.

Disclosure of Your Information: Who We Share Your Information With

Citrin Longevity respects your privacy, and we do not sell, rent, lease, trade or otherwise transfer any information collected, whether automatically or through your voluntary action, to third parties (beyond what is necessary for the basic functionality of an online service or for fulfilling a customer transaction if applicable) without your consent.

We may disclose personal information that we collect, including that you provide, as described in this Privacy Policy:

- To our subsidiaries and affiliates, if any.
- To third parties including, for example: contractors, service providers and ‘data processors’ as described below, that we use to support our business and our Website. All such third parties will always be bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a third party, including a lawyer or collection agency, when necessary to enforce our Website Terms & Conditions or any other applicable terms of use, terms & conditions or agreement between you and Citrin Longevity, including for billing and collection purposes.

- To any successor in interest in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Citrin Longevity's assets and/or business.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Citrin Longevity, other users of the Website or the general public. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- To comply with any legal obligations such as court order, law or legal process, including to respond to any government or regulatory request and when compelled by a court or other governmental entity to do so.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

How Long Your Personal Information Will Be Kept

We will retain all non-client or customer personal information until you let us know you would like for us to delete it or unsubscribe from our email contacts, which you are free to do at any time.

This does not apply to information from patients of Citrin Longevity. We will hold patient health information in our files as required by applicable law and until at least one (1) year after any relevant statute of limitation on professional liability has run.

How We Protect Your Information: Data Security and Information Storage

We employ commercially reasonable methods to ensure the security of the information you provide to us and the information we collect automatically. This includes using standard security protocols and working only with reputable third-party vendors. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

If Citrin Longevity collects sensitive personal information (such as credit card data), that information is encrypted and transmitted to us in a secure way. Customers can verify this by looking for a closed lock icon at the bottom of their web browser or looking for "https" at the beginning of the address of the web page.

However, please note that unfortunately no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. You acknowledge that (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through this Website cannot be

guaranteed; and (c) any such information and data may be viewed or tampered within transit by a third party. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

We will notify you and any applicable authorities of a suspected data security breach where we are legally required to do so.

Please note that any comments or information that you post on the Website, including Citrin Longevity's social media pages, become public, and third parties may use your information. We are not responsible for any unauthorized uses by third parties in such context. You disclose such information at your own risk.

The HIPAA Privacy Rule

The US Department of Health and Human Services provides: "The HIPAA Privacy Rule establishes national standards to protect individuals' medical records and other personal health information and applies to health plans, health care clearinghouses, and those health care providers that conduct certain health care transactions electronically. The Rule requires appropriate safeguards to protect the privacy of personal health information and sets limits and conditions on the uses and disclosures that may be made of such information without patient authorization. The Rule also gives patients certain rights over their health information, including rights to examine and obtain a copy of their health records, and to request corrections."

You acknowledge that our operation of the Website does not constitute the practice of medicine and specifically does not create a doctor-patient relationship between you and the medical professionals at Citrin Longevity. The information provided on the Website is for informational and educational purposes only.

Notwithstanding the fact that the Website does not create a doctor-patient relationship between you and our medical providers, our preservation of your personal health information will be HIPAA compliant if you schedule an appointment and become a patient of Citrin Longevity.

For purposes of this Privacy Policy, "patients" are those individuals who have secured the naturopathic medical or acupuncture services of Citrin Longevity and completed all new patient forms. If you are a patient of Citrin Longevity, you will be provided with a copy of our HIPAA Notice of Privacy Practices, which governs the information collection practices of patients' personal information by Citrin Longevity.

Third-party Use of Cookies and Other Tracking Technologies

Some content or applications on the Website may be served by third parties, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions, you should contact the responsible provider directly.

Your Rights: Accessing, Correcting and Deleting Your Information

As noted above, if you want to unsubscribe from receiving e-mails from Citrin Longevity you may do so at any time. Each e-mail from Citrin Longevity includes instructions for unsubscribing from these e-mail communications.

You may send us an e-mail to info@citrinlongevity.com in order request access to, correct or delete any personal information that you have provided to us.

Please note that we may retain some or all of the information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may also decline to share certain personal information with us, in which case we may not be able to provide you with some of the features and functionality of our services.

If you place an order through the Website, we will maintain your order information for our records unless and until you ask us to delete this information. We are required to keep some basic information about our customers including transaction data for tax and legal purposes and therefore there is some information that cannot be deleted.

California Online Privacy Protection Act

The California Online Privacy Protection Act (CalOPPA) is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates a website collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. — See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

Pursuant to CalOPPA we agree to the following:

- Users can visit our Website anonymously
- There is a link to our Privacy Policy on our home page or at a minimum on the first significant page after entering our Website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.
- Users will be notified of any changes to our Privacy Policy:

- o On our Website Privacy Policy page
- Users are able to change their personal information:
 - o By emailing us
 - o By logging into their account on our Website if they have one

As noted above, if your browser sends a "Do Not Track" signal, only a generic cookie will be placed on your device while the Website is accessed.

California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act (CCPA) took effect on January 1, 2020 and is intended to protect the personal information of California residents. The CCPA has certain threshold requirements which a company must meet in order to be required to comply with its provisions. Upon information and belief, we do not meet those thresholds. In the event of a change in our status, and if the data that you provide in the course of your use of the Website is governed by CCPA, we will abide by the relevant portions of the CCPA.

If you are a resident of the state of California, you may have the right to: request disclosure of the personal information we have collected about you and the types of third parties with whom it has been shared; request a portable copy of your information; opt out from marketing messages or the sale of your information to third parties; and request deletion of your personal information. To make these requests, please contact us at info@citrinlongevity.com.

Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at info@citrinlongevity.com.