

Privacy Policy Statement

The effective date of this notice is January 1st, 2020

This Privacy Statement ("**Statement**") describes the policy adhered and enforced by Elite Epigenetics LLC. ("Elite") with respect to your Protected Health Information ("**PHI**") for collecting, managing, and using personal and corporate information collected through our websites and mobile applications (*hereinafter referred to as the "Site"*). The terms "**we**" and "**us**" are used interchangeably to refer to Elite and its employees and workforce members. All Elite employees and workforce members who are involved in providing and coordinating health care and related services are all bound to follow the terms of this Privacy Policy Statement.

Elite is committed to respecting and protecting the personal privacy of its members and those who visit its Web site and use. It is our policy to acquire personal information from users only by overt and voluntary means, only when it is in the interest of the user to provide it, and to utilize this information only for the purpose it was provided.

The information that follows explains the kinds of information the Site collects, how it is used, the conditions under which it is made available to third parties, how information is maintained, and our compliance with the Children's Online Privacy Protection Act.

1. Information We Collect and How We Use It

This Site collects information that you voluntarily provide to us as necessary to provide Services to you and processing payments for services rendered or products purchased by you.

Personally identifiable data is collected only by means of form interfaces on the site, into which the user must voluntarily enter the information requested. This information is requested only when it is necessary to accomplish the overt purpose indicated by the interface containing the form that requests it.

No attempt is made to covertly or "quietly" collect personally identifiable information, nor are cookies or any other tracking technology used for the purpose of coordinating information that a user may opt to enter in various interfaces on the site.

Anonymous information collected is used to monitor the usage of this Web site and the interests of those who use it. Data such as the volume of traffic to the server, the number of visitors a certain section of the site receives each month, or the most popular search terms are analyzed to derive general statistics about the site's reach and the audience's usage patterns.

Personally identifiable information is used only for the express purpose for which it was submitted. For example, if a user enters their contact information in the "Contact Us" form. This information will be directed to the appropriate person within our organization with the knowledge and authority to respond to your request. When a user answers questions related to the contest, the answers will be used specifically for selecting a winner of the contest.

2. Handling of Information

Account information. We ask for and store information about you when you create an account on the Site, such as your name, email address, and signup location. We also support the "Open ID" authentication system. You can also import your account information from a third party to make the Site registration process easier. In some cases, we will use your name to create your account name (first name initial and last name), and we use your signup location to connect you to the correct geographically appropriate Site to meet your particular service request. We use your email address and/or your mobile phone to send you updates and provide services to you as requested in connection with the Site. We may also use your signup location, birth date, and gender (if provided by you) to display relevant content, promotions, merchant discounts, and vendor information.

Public content. We might, from time to time, conduct surveys and polls on our web site. Answers to questions and results of polls are considered public content and could be posted on the site with reference to you. You can contribute to the Site in a number of different ways, including writing reviews,

uploading photos, participating in talk threads, sending compliments, filling out your public profile, and voting on other users' contributions. We may store these contributions (your "**Public Content**"), display them to other users, and use them for promotional purposes. Note that if you include personally identifiable information in your Public Content, it can be used and viewed by others. We are not responsible for the information you choose to include in your Public Content.

Genetic Data. We collect biological samples (hair, saliva, nails, urine, etc.) from you as needed to provide recommendations, treatments, and reports. Elite does not use any third-party DNA testing companies, but instead processes all samples internally. Therefore, no contractors or third-party providers will have access to your genetic data. All biological samples are destroyed after they are processed by our scanning technology.

Treatment. We will use and disclose your health information as necessary to provide, coordinate, and/or manage your treatment and any related services with a medical practitioner designated by you. For example, we may disclose your health information to your physician, technicians, nurses, trainers, therapists, and/or other personnel involved in your care. We may share your health information to coordinate treatment options such as prescriptions, laboratory results, and other data that could be pertinent to your health. We may also share your health information with other providers that could be involved in your care.

Biometric Data. We may collect all information you choose to communicate to us in the course of using the Services, including information that does not personally identify you, such as biometric data from a remote health monitoring device (i.e. Fitbit, Apple Health App, Holter monitor, blue-tooth scale, etc.), or any food, meals, or drinks that you log into a food logging system for our review. When we collect this type of information, we may provide various displays of this information for your convenience, including displays that may add additional information to your data.

Third Party Service Providers. We may use third parties to provide technical, consulting, coaching, and customer support services, perform tracking and reporting functions, conduct quality assurance testing, perform payment processing, and provide other services in connection with the Site. We may share information about you with them so that they can perform the services they are required to perform, but they are not permitted to use your personal information other than to provide the services requested by you. All third party service providers are required to enter into non-disclosure and data security agreements.

Messaging. The Site allows you to exchange messages with us using the messaging feature and email. We may store these messages in order to deliver them and allow you to manage them. The Site also allows you to send information from the Site to your phone via text message. In order to carry out these requests, we may log your phone number, your carrier, and the date and time that the message was processed. Your carrier may charge you for texts that you receive. We may directly contact you to remind you about an upcoming appointment.

Questionnaires. Elite frequently uses questionnaires to collect more detailed information from you as necessary from time-to-time to increase the quality and value of services provided to you. We will collect all information you choose to provide in the course of completing any questionnaires or any other forms or surveys we may provide. This information may include your name, contact information, birthdate, age, gender, blood type, profession, marital status, personal attributes (e.g., height, weight, education level, other body measurements), dietary information, health-related information (e.g., medication information, diseases, blood glucose levels, cholesterol levels), family medical histories, and emotional wellbeing.

Third Party Advertising. Third parties serve some of the ads on the Site, but we do not send any individualized personal information to them. Note that we do not rent, share, sell or trade personally identifiable information with third parties for their direct marketing purposes.

Medical Data. All PHI data related to our clients collected by any means, which in the context of how the data is collected and used by Elite, is considered patient data and is therefore governed in compliance with the Health Insurance Portability and Accountability Act (HIPAA) and its implementing regulations. Any PHI data collected can and will only be shared with the patient and medical professionals designated and approved by the client. The members of Elite will share PHI with each other only for the purpose of

treatment, any applicable billing, and designing wellness plans for the view and benefit of only the client as permitted by HIPAA and this Statement.

Cookies. We might send cookies to your computer in order to uniquely identify your browser and improve the quality of our service. "**Cookies**" refer to small pieces of information that a website sends to your computer's hard drive while you are viewing the Site. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them). Persistent cookies can be removed by following your browser help file directions. If you choose to disable cookies, some areas of the Site may not work properly or at all. Our cookies are linked to your information, such as your name, email address and password. We enable some of our business partners to use cookies in conjunction with your use of the Site. These cookies collect information about your use of the Site, such as where you came from, which pages you visited within the Site, and possibly other sites you visit if those sites cooperate with the same third party, but do not collect your name, email address, contact information or other personally identifiable information that by itself would allow the third party to identify or contact you.

Aggregate Information. We may share non-personal information in the aggregate to third parties relating to user behavior in connection with actual or prospective business relationship with those third parties, such as advertisers and content distributors. For example, we may disclose the number of users that have been exposed to, or clicked on, content on our Site.

Feedback. If you should feel free to give us feedback, register a complaint, or ask questions about the Site. We may store your communications, including any personal information you include in them, so that we can effectively respond to you.

Business Transfers. We may share your information with our parent company, subsidiaries, joint ventures, technology partner, or other companies under a common control that we may have now or in the future, in which case we will require them to honor this Privacy Statement. If another company acquires our company or all or substantially all of our assets, that company will possess your information, and will assume the rights and obligations with respect to that information as described in this Statement.

Investigations. We reserve the right to investigate abuses on the Site, and enforce and apply our Terms of Service. We may disclose information about you to appropriate third party authorities if we have a good faith belief that such disclosure is reasonably necessary to (a) take action regarding suspected illegal activities; (b) enforce or apply our Terms of Service; (c) comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us; or (d) protect our rights, reputation, and property, or that of our users, affiliates, or the public.

Data Storage. All data pertinent to the Site, including any data, photos, review comments, etc you up-load to the site is securely stored in the United States.

Credit Card Purchases. If you pay for any products or services on our online Site, our credit card processor will collect and store billing and credit card information. Your credit card information will be stored and encrypted in our systems as prescribed by the PCI Data Security Standards Council (<https://www.pcisecuritystandards.org/>). Our employees and customer service personnel can only view the last 4 digits of your credit card kept on file. Your credit card information will never be shared with third party service providers. When you enter sensitive information (such as a credit card number) on our registration or order forms, the information is encrypted using 128-bit secure socket layer technology (SSL).

3. Children's Online Privacy Protection Act (COPPA) of 1998?

This legislation applies only to Web sites of a commercial nature. However, Elite considers this act to provide sound advice for any Web site that is intended for use by children.

Therefore, Elite does not use its Site to collect any personally identifiable information from children under 13 years of age. Any input form that requests personally identifiable information that appears on an interface that is expected to be viewed by children under 13 years of age is accompanied by a notice that

submissions cannot be accepted from users under 13 years of age. Where "age" or "date of birth" is requested, no information will be stored or transmitted unless the response indicates that the user is 13 years of age or older.

If you become aware that your child has provided us with personal information without your consent, please contact us. If we become aware that a child under 14 has provided us with personal information without parental consent, we will take steps to remove their information and terminate the child's account.

4. Links

The Site may contain links to third party websites and digital libraries with which we have no affiliation. Except as set forth herein, we do not share your personal information with those third parties, and are not responsible for their privacy practices. We suggest you read the privacy policies on all such third party websites.

5. Security

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

6. Managing Your Information

For Users that complete information forms located on the web site, you are then inherently given us permission to send you printed information via postal mail, email messages, and text messages that we deem appropriate for your viewing. Requesting information or for an agent to contact you is considered an opt-in approval for Elite to contact you or provide information alerts and notices.

We provide a number of tools to manage your profile on the Site. You may receive regular communications from us. Depending on your request, we may still need to contact you as required by law or on legal matters, for example if a request to give access to a third-party to view your health records.

7. Links

The Site may contain links to third party websites with which we have no affiliation. Except as set forth herein, we do not share your personal information with those third parties, and are not responsible for their privacy practices. We suggest you read the privacy policies on all such third-party websites.

8. Our Responsibilities

To summarize and clarify our responsibilities as set forth in this Statement, we are required to:

- Maintain the privacy of confided information. This is personal information that has been provided to us in confidence;
- Securely maintain privacy of your PHI
- Provide you with a Notice as to our legal duties and privacy practices with respect to information we maintain about you;
- Abide by the terms of this Statement;
- We will not disclose your health information without your authorization, except as described in this Statement;
- Notify you in the event of a breach of your PHI.

9. For More Information or to Report a Breach of Privacy

If you have any questions or would like additional information regarding our privacy practices, you may contact Elite Epigenetics at 662-253-8973 or you can send an email to info@EliteEpigenetics.com

If you believe that Elite Epigenetics has not adhered to this Privacy Statement you may direct your concerns to our Legal department at the email or physical address:

Elite Epigenetics LLC.
Ref: Privacy Officer
5740 Getwell Rd.
Southaven, MS 38672
United States of America
info@EliteEpigenetics.com

10. Our Commitment to Your Privacy

Elite has a legal, ethical, and moral obligation to protect your privacy. We are dedicated to maintaining your confidentiality and privacy of your PHI.

By supplying your contact information and other personal information, you authorize Elite and our authorized representatives to contact you directly, as needed. This contact could be in the form of an email, text message, or detailed voice message left on your phone/mobile/ or answering machine device.

Elite complies with all state and federal laws pertaining to your privacy right when maintaining and using your PHI. In adherence to these state and federal laws, we are required to follow the terms of the Privacy Policy Statement that is in effect at the present time.

11. Policy Modifications and Deviations

We reserve the right to change our privacy practices and this Statement from time to time. The most current version of the Statement will govern our use of your information and will always be located on our web site. If we make a change to this Statement that, in our sole discretion, is material, we will notify you either by prominently posting a notice of such changes prior to implementing the change on the Site and/or via the email associated with your account. By continuing to access or use the Services after those changes become effective, you agree to the revised Statement.