Privacy Notice[1] [2]

Effective Date: **September 15, 2025**

Circumstance Health, Inc. ("**Stance Health**," "**us**," "**we**," or "**our**") is committed to protecting the privacy of Personal Data (i.e., information reasonably related to a specific individual). This Privacy Notice describes how we process Personal Data collected through our websites, platforms, social media accounts, mobile applications, and other online interactions and communications such as email (collectively, our "**Services**"), and other online and offline interactions.

"Personal Data" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Data does not include publicly available information, de-identified or aggregated information, or information covered by certain federal and state laws.

Please note that our specific information practices will depend on your relationship with us, for example, if we provide services to you on behalf of a healthcare provider that is a "covered entity" under the Health Insurance Portability and Accountability Act ("HIPAA"). This includes when we provide services to you on behalf of Stance Health, P.A., our affiliated clinical professional organization[3] [4] [K&S5] . For more information about how Stance Health, P.A. processes your protected health information ("PHI"), please visit [INSERT LINK TO NPP].

1. Sources of Personal Data

We collect Personal Data about you from the following sources:

- **Directly from you.** We may collect Personal Data you provide to us directly, such as when you contact us through our Services, interact with us in person, sign up for offers or newsletters, communicate with us, place or customize orders, or sign up for an account or other services.

- **Data collected automatically and through tracking technologies.** We may automatically collect information or inferences about you, such as through cookies and other tracking technologies, when you interact with our Services. This may include information about how you use and interact with our Services, information about your device, and internet usage information.

- **From third parties.** We may collect Personal Data from third parties, such as service and content providers, our affiliated companies and subsidiaries, business partners, social media companies or other parties who interact with us.

- **From publicly available sources**. We may collect Personal Data about you from publicly available sources, such as public profiles and websites.

We may combine information that we receive from the various sources described in this Privacy Notice, including third- party sources, and use or disclose the combined information for the purposes identified below.

2. Types of Personal Data We Collect

We may collect the following types of Personal Data:

- **Identifiers,** such as your name, email address, physical address, and device identifiers (e.g., IP address).

- **Records about you**, such as the content, timing, and method of communications you have with us, including online chats, calls, and emails; and information you share with, upload to, or send through our Services, such as reviews and comments.

- **Demographic information**, such as age (including birthdates), gender, race, ethnicity, and sexual orientation.

- **Commercial information**, such as information related to your transactions or products or services purchased, obtained, or considered.

- **Internet or other electronic network activity information**, such as your browsing history, search history, preference information (including marketing and purchasing preferences), account settings (including any default preferences), and other information regarding your interactions with and use of the Services. For more information about cookies and other device data, please see the "Cookies and Other Tracking Technologies" section below.

- **Non-precise geolocation data**, such as your location as derived from your IP address.

- **Professional or employment-related information**, such as job title; organization; professional licenses, credentials, or affiliations; and other professional information.

- **Sensitive Personal Data**, such as information about mental or physical health; race or ethnicity, political opinions, or religious or philosophical beliefs; information concerning your sex life or sexual orientation; login credentials (if you choose to create an account with us); and the contents of messages that you send through or using the Services.

3. How We Use Personal Data

We may use Personal Data for the following purposes:

- **To provide you products and services**, such as making our Services, products and services available to you; providing and delivering you the goods and services you request; providing customer service; processing or fulfilling orders and transactions (including processing payments); verifying customer information and eligibility for certain programs or benefits; communicating with you (including soliciting feedback or responding to requests, complaints, and inquiries); and providing similar services or otherwise facilitating your relationship with us.

- **For our internal business purposes**, such as day-to-day operation of our business; maintaining internal business records, such as accounting, document management and similar activities; enforcing our policies and rules; management reporting; auditing; and IT security and administration.

- **For our internal research and product improvement purposes**, such as verifying or maintaining the quality or safety of our products or services; improving our products or services; designing new products and services; evaluating the effectiveness of our advertising or marketing efforts; and debugging and repairing errors with our systems, networks, and equipment.

- **For legal, safety, or security reasons**, such as complying with legal, reporting, and similar requirements; investigating and responding to claims against us, our personnel, and our customers; for the establishment, exercise or defense of legal claims; protecting our, your, our customers', and other third parties' safety, property or rights; detecting, preventing, and responding to security incidents and health and safety issues (including managing spread of communicable diseases); and protecting against malicious, deceptive, fraudulent, or illegal activity.

- **In connection with a corporate transaction**, such as if we acquire assets of another business, or sell or transfer all or a portion of our business or assets including through a sale in connection with bankruptcy and other forms of corporate change.

- **For marketing and targeted advertising**, such as marketing our products or services or those of our affiliates, business partners, or other third parties. For example, we may use Personal Data to analyze interactions with us or our Services; or to send you newsletters, surveys, questionnaires, or promotions.

We may use anonymized, de-identified, or aggregated information for any purpose permitted by law.

4. How We Disclose Personal Data

We may disclose Personal Data to third parties, including the categories of recipients described below:

- **Affiliates and subsidiaries**, including parent entities, corporate affiliates, subsidiaries, business units, and other companies that share common ownership.

- **Third-party providers** that we work with to provide the products and services you request or support our relationship with you, such as advertising networks, IT providers, internet service providers, web hosting providers, data analytics providers, and companies that provide business support services, financial administration, or event organization.

- **Professional consultants**, such as accountants, lawyers, financial advisors, and audit firms.

- **Law enforcement, government agencies, and other recipients for legal, security, or safety purposes**, such as when we share information to comply with law or legal requirements, to enforce or apply our Terms of Service and other agreements or policies, and to protect our, our customers', or third parties' safety, property, or rights.

- **Other entities in connection with a corporate transaction**, such as if we acquire assets of another entity, or sell or transfer all or a portion of our business or assets including through a sale in connection with bankruptcy and other forms of corporate change.

- **Business partners** that may use Personal Data for their own purposes. Where required by law, we will obtain your consent prior to disclosing your Personal Data to our business partners. Where recipients use your Personal Data for their own purposes independently from us, we are not responsible for their privacy practices or personal data processing policies. You should consult the privacy notices of those third-party services for details on their practices.

- **The public**, such as when you have an opportunity to make comments regarding us or our products that we may share with the public, including comments on our blog posts and reviews on our product pages. Any Personal Data in comments, reviews, or other content that you share in public areas of our Services may be read, collected, or used by other users or the public.

- **Entities to which you have consented to the disclosure**.

5. Cookies and Other Tracking Technologies

Our Services and authorized third parties use cookies and other tracking technologies to collect information about you, your device, and how you interact with our Services. A "cookie" is a small text file that is placed on your computer or mobile device when you visit a website. Other data collection technologies we may use include "pixels," a code that is embedded on a website or in an email; "session replay tools," which record your interactions with websites; "embedded scripts," which are scripts temporarily downloaded to a device from a web server; and "local storage," which generally refers to other places on a browser or device where information can be stored. Some cookies and other data collection technologies are deleted when you end your session, while others are stored between sessions.

The data collection technologies we may use change from time to time, but we generally use them for the following purposes:

- ***Strictly necessary.*** These technologies are needed to make our Services run correctly.

- ***Functionality.*** We use these technologies to help us remember you and personalize features and content for you on our Services.

- ***Analytics.*** We use these technologies to compile statistics and analytics about our users, including traffic, usage, and trend data. For example, we use Google Analytics to help us understand how users engage with our Services. This information helps us improve our online services. To learn more about how Google Analytics uses your data, please visit www.google.com/policies/privacy/partners.

- ***Advertising.*** We use these technologies to place advertisements and other content on our Services and third-party websites. These technologies may track your activity over time and across properties to understand and to advertise to your interests ("interest-based advertising"). Please note that some jurisdictions may consider this a "sale" of Personal Data.

Your choices. You can refuse or delete cookies using your browser settings. If you refuse or delete cookies, some of our Services' functionality may be impaired. Please refer to your browser's Help instructions to learn more about how to manage cookies and the use of other tracking technologies. If you change computers, devices, or browsers; use multiple computers, devices, or browsers; or delete your cookies, you may need to repeat this process for each computer, device, or browser. Opting out of interest-based advertising will not opt you out of all advertising, but rather only interest-based advertising from us or our agents or representatives. You may also be able to opt out of certain interest-based advertising using tools provided by the Digital Advertising ("DAA") and Network Advertising Initiative ("NAI"). For more information, please visit http://www.aboutads.info/choices/ and https://optout.networkadvertising.org/.

Do Not Track. Some browsers have incorporated Do Not Track ("DNT") preferences. At this time, we do not honor Do Not Track signals. However, our Services may recognize certain opt-out preference signals, such as the Global Privacy Control, and will process such signals in accordance with applicable law, potentially including "do not sell", "do not share", and opt out of targeted advertising requests. You may set such a signal through your browser or browser extension.

6. Data Security and Data Retention

Although we maintain reasonable security safeguards, no security measures or communications over the Internet can be 100% secure, and we cannot guarantee the security of your information.

Your Personal Data will be retained as long as necessary to fulfill the purposes we have outlined above unless we are required to do otherwise by applicable law. This includes retaining your Personal Data to provide you with the products or services you have requested and interact with you; maintain our business relationship with you; improve our business over time; ensure the ongoing legality, safety and security of our services and relationships; or otherwise in accordance with our internal retention procedures. Once you have terminated your relationship with us, we may retain your Personal Data in our systems and records in order to ensure adequate fulfillment of surviving provisions in terminated contracts or for other legitimate business purposes, such as to enable easier future user onboarding, demonstrate our business practices and contractual obligations, or provide you with information about our products and services in case of interest.

7. Children's Privacy

Our Services are intended for individuals 18 years of age and older. The Services are not directed at, marketed to, nor intended for, children under 18 years of age. As a general rule, we do not knowingly collect any information, including Personal Data, from children under 18 years of age. If you believe that we have inadvertently collected Personal Data from a child under the age of 18, please contact us at the address in the "Contact Us" section below, and we will take prompt steps to delete the information.

8. Your Privacy Rights

You may have the rights listed below ("Data Subject Rights") with respect to the personal data that we collect or process about you. These rights differ depending on your place of residency, including California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia. Please note that we reserve the right to honor your Data Subject Rights to the extent required by applicable law.

- ***Right to Confirm Processing, Access, and/or Obtain a Copy*** (referred to in some places as a Data Subject Access Request): If you ask us, we will confirm whether we are processing your Personal Data. Additionally, upon request, we will provide you with a copy of all Personal Data you are lawfully entitled to

receive, potentially including specific pieces of information, along with certain other details.

- ***Right to Amend***: If you believe your Personal Data is inaccurate or incomplete, you may request that we correct it.

- ***Right to Delete***: You may request that we delete Personal Data that we maintain about you.

- ***Right of Portability***: You may request that we move, copy, or transfer the electronic Personal Data that we hold about you to another organization.

- ***Right to Revoke Consent and/or Opt Out of Certain Processing Activities***: You may ask us to restrict or stop the processing of your Personal Data. This includes general requests and requests in specific contexts, such as if we process Personal Data that is considered "sensitive" under applicable U.S. state laws or engage in certain automated decision-making activities.

- ***Right to Opt Out of Targeted Advertising***: Targeted advertising is the practice of serving you tailored advertisements based your Personal Data gathered over time and across other businesses, websites, applications, or services. Some jurisdictions may refer to this activity as "sharing." You have the right to opt out of this practice.

- ***Right to Opt Out of Sales***: Some states may consider targeted advertising a "sale" of Personal Data. You may request that we not "sell" your Personal Data.

- ***Right to Non-Discrimination***: We will not discriminate against you for exercising Data Subject Rights, but we may charge a reasonable fee as permitted by law in fulfilling these rights, such as if you request multiple copies of your Personal Data.

- ***Right to Appeal***: If we deny your request to exercise a Data Subject Right, you may have the right to appeal the decision with us. If you would like to appeal a prior decision, please be sure to include information about your prior request so that we may locate our earlier determination.

- ***Right to Lodge a Complaint***: You may submit a complaint to the competent supervisory authority in the place in which you live if you have any concerns about our processing of your Personal Data or if we deny your appeal to review a prior decision about your Data Subject Rights.

If you or your authorized agent would like to exercise a Data Subject Right, you may do so by following the contact instructions at the end of this Privacy Notice. In order to process your request to exercise a Data Subject Right, we will ask you to verify your identity by confirming your name, e-mail address, phone number, or other identifiable

information that we have in our records, such as most recent interaction with us, if applicable.

9. Location of Processing

The Services are intended for residents of the United States. Personal Data we collect will be stored on secure cloud-based servers in the United States.

10. California Residents

California's "Shine the Light" law (Civil Code § 1798.83) permits 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 to support@stancehealth.co.

The following disclosures are made pursuant to the California Consumer Privacy Act, as amended ("CCPA").

- ***Categories of Personal Information Collected***: In the previous 12 months, we have collected the personal information listed in the section "Types of Personal Data We Collect" above. This information falls into the following categories under the CCPA: identifiers; categories of personal information described in Cal. Civ. Code 1798.80(e); commercial information; geolocation information; internet or electronic network activity information; inferences drawn from the above categories; and professional or employment-related information. Additionally, we collect the types of "sensitive" personal information identified in "Types of Personal Data We Collect" above.

- ***Sensitive Personal Information Uses or Disclosures***: We do not use or disclose "sensitive" personal information for purposes other than those specified by the CCPA.

- ***Business or Commercial Purpose for Collecting and Selling Information***: We collect personal information for the business and commercial purposes described in "How We Use Personal Data" and "How We Disclose Personal Data" above.

- ***Categories of Sources of Personal Information***: We collect personal information from and about you as described in "Sources of Personal Data" above.

- ***Categories of Third Parties with Whom We Disclose Information***: We may disclose your personal information with third parties as described in "How We Disclose Personal Data" above.

- ***Categories of Personal Information Disclosed***: In the preceding 12 months, we have disclosed the categories of personal information listed in "Types of Personal Data We Collect" for the reasons described in "How We Disclose Personal Data" above.

- ***Sale or Share of Personal Information***: Because we engage in the practice of cross context behavioral advertising, also known as interest-based advertising, we may "sell" and/or "share" your personal information as those terms are defined by the CCPA. In the preceding 12 months, we may have "sold" or "shared" identifiers, commercial information, and internet or electronic network activity information with data analytics, advertising networks, and/or social media networks.

11. External Links

Our Services may contain links to external sites or other online services that we do not control, including those embedded in third party advertisements or sponsor information. We are not responsible for the privacy practices or data collection policies of such third-party services. You should consult the privacy notices of those third-party services for details on their practices.

12. Changes to this Privacy Notice

We may update this Privacy Notice from time to time. Any updated Privacy Notice will be effective when posted. Please check this Privacy Notice periodically for updates. If required by law, we will contact you directly to provide you with an updated Privacy Notice.

13. Contact Us

If you have questions regarding this Privacy Notice, please contact us at support@stancehealth.co. Alternatively, you may write to us at:

Circumstance Health, Inc.
407 Lincoln Rd
Ste 6H, PMB 350
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