

Privacy Policy

Effective Date: June 1, 2026 · Last Updated: June 1, 2026

Reactides LLC and Tyme Regenerative Wellness LLC (collectively, "Company," "we," "us," or "our") are committed to protecting the privacy and security of your personal and health information. This Privacy Policy explains how we collect, use, disclose, and protect information obtained through our telehealth wellness portal and associated services (the "Platform"). This Policy constitutes part of our Terms of Service. By using the Platform, you consent to the practices described herein.

1. SCOPE

This Policy applies to all users of the Platform, including patients, prospective patients, and visitors. It does not apply to the independent licensed healthcare providers ("Providers") who access the Platform; their data practices are governed by their own privacy policies and applicable professional obligations. Where Providers handle your Protected Health Information ("PHI") in connection with your care, the HIPAA Notice of Privacy Practices (incorporated by reference) applies in addition to this Policy.

2. INFORMATION WE COLLECT

We collect information in the following categories:

CATEGORY A — IDENTIFIERS

Full name, date of birth, email address, telephone number, postal address, IP address, and government-issued identification where required for identity verification.

CATEGORY B — PROTECTED HEALTH INFORMATION (PHI) / HEALTH DATA

Medical and health history, current medications and supplements, symptoms, lab results, treatment goals, and all other health-related information submitted through intake forms or consultations. PHI is subject to HIPAA and our Notice of Privacy Practices.

CATEGORY C — FINANCIAL INFORMATION

Payment card type and last four digits, billing address, and transaction records. Full payment card numbers are collected and processed solely by our PCI-DSS compliant third-party payment processor and are never stored on Company servers.

CATEGORY D — INTERNET & DEVICE ACTIVITY

Browser type and version, operating system, device identifiers, referring URLs, pages visited, session duration, and clickstream data collected automatically via cookies and server logs.

We do not knowingly collect sensitive personal information beyond Categories A–D above without your explicit consent.

3. HOW WE USE YOUR INFORMATION

We process your information only for the following lawful purposes:

- To provide, coordinate, and administer telehealth wellness services and related Platform features
- To match you with and facilitate consultations with independent licensed Providers
- To process payments, issue receipts, and maintain financial records as required by law
- To send transactional communications: appointment confirmations, reminders, and care-related follow-ups
- To comply with applicable federal and state legal and regulatory obligations
- To detect, investigate, and prevent fraud, security incidents, and unauthorized access
- To improve Platform functionality, user experience, and service quality through aggregated, de-identified analytics

We do **not** sell, rent, or trade your personal information or PHI to third parties for commercial purposes. We do not use your PHI for advertising, marketing, or profiling without a separately obtained HIPAA-compliant

authorization.

4. DISCLOSURE OF INFORMATION

We disclose your information only as follows:

- **Providers:** Independent licensed healthcare providers involved in your care, subject to executed Business Associate Agreements (BAAs) where PHI is involved, in compliance with 45 C.F.R. Parts 160 and 164.
- **Business Associates / Service Providers:** HIPAA-compliant and contractually obligated vendors providing telehealth infrastructure, EHR/scheduling systems, payment processing, and data hosting. All vendors with PHI access execute BAAs.
- **Legal Compliance:** When required by applicable law, regulation, valid court order, subpoena, or governmental investigation, or to protect the rights, property, or safety of the Company, users, or the public.
- **Business Transfers:** In connection with a merger, acquisition, restructuring, or sale of all or substantially all Company assets, provided the successor entity assumes equivalent privacy obligations.
- **With Your Authorization:** For any purpose not listed above, only with your prior written (or HIPAA-compliant) authorization, which you may revoke at any time.

5. DATA SECURITY

We maintain a comprehensive information security program that includes administrative, technical, and physical safeguards appropriate to the sensitivity of the information processed, including:

- TLS 1.2+ encryption for all data in transit
- AES-256 encryption for PHI and sensitive data at rest
- Role-based access controls and multi-factor authentication for system access
- Regular security risk assessments consistent with the HIPAA Security Rule (45 C.F.R. Part 164, Subpart C)
- Audit logging of access to PHI

No data transmission or storage system is completely secure. In the event of a breach of unsecured PHI, we will provide notification to affected individuals and regulators as required by the HIPAA Breach Notification Rule (45 C.F.R. Part 164, Subpart D) and applicable state breach notification laws, including California Civil Code § 1798.29 and § 1798.82.

6. YOUR PRIVACY RIGHTS

Depending on your jurisdiction, you may have the following rights with respect to your personal information:

HIPAA RIGHTS (PHI)

Right to access, amend, and receive an accounting of disclosures of your PHI; right to request restrictions; right to confidential communications. See our Notice of Privacy Practices for full details.

CALIFORNIA RESIDENTS — CCPA / CPRA

Right to know what personal information is collected, used, shared, or sold; right to delete; right to correct; right to opt-out of sale or sharing; right to limit use of sensitive personal information; right to non-discrimination for exercising rights. To submit a verifiable consumer request: privacy@reactides.com.

ALL USERS

Right to access your account data; right to correct inaccurate information; right to withdraw consent (where processing is consent-based); right to lodge a complaint with applicable supervisory authorities.

We will respond to verified requests within 45 days. We may extend this period by an additional 45 days where reasonably necessary, with prior notice. We will not discriminate against you for exercising any privacy rights.

7. COOKIES & TRACKING TECHNOLOGIES

We use strictly necessary cookies to maintain session integrity and authentication. We use analytics cookies (aggregated, non-identifiable) to measure Platform performance. We do **not** deploy third-party advertising cookies, cross-site behavioral tracking pixels, or sell browsing data to data brokers.

You may configure your browser to refuse all cookies or to alert you when cookies are being sent. Disabling strictly necessary cookies will impair Platform functionality.

8. DATA RETENTION

We retain personal information and PHI for the period necessary to fulfill the purposes described in this Policy, to comply with applicable law, and to resolve disputes. Health and medical records are retained for a minimum of seven (7) years from the date of last service, or such longer period as required by California

Health and Safety Code § 123111 or other applicable law. Financial records are retained as required by applicable tax and accounting regulations. De-identified, aggregated analytics data may be retained indefinitely.

9. MINORS

The Platform is not directed to, and we do not knowingly collect personal information from, individuals under 18 years of age. If you are a parent or guardian and believe your minor child has submitted personal information without your consent, contact us immediately at privacy@reactides.com and we will promptly delete the information.

10. CHANGES TO THIS POLICY

We may update this Policy periodically to reflect changes in our practices or applicable law. We will provide at least 30 days' advance notice of material changes via email to registered users and a prominent notice on the Platform. The "Last Updated" date at the top of this Policy reflects the most recent revision. Your continued use of the Platform after the effective date of a revised Policy constitutes acceptance of the changes.

Contact

Reactides LLC / Tyme Regenerative Wellness LLC — Privacy Officer

Email: privacy@reactides.com

Mail: [Street Address], Irvine, CA [ZIP]

Response time: Within 45 days of receipt