

Privacy Policy

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Introduction

LL Services, LLC, on its own behalf and its affiliates and/or subsidiaries including but not limited to LL Medical Clinic, P.A., LL Medical Clinic, NJ, P.A., LL Medical Clinic, CA, P.C., and LL Medical Clinic, KS, P.A. (collectively referred to as "**LL Services**", "**we**", "**us**", or "**our**"), makes certain telehealth related information available to you and/or facilitates your access to telemedicine, your prior health information, and other medical services ("**Services**").

This Privacy Policy applies to visitors of the following publicly available Sites: www.llmedicalclinic.com and the publicly available associated domains and mobile applications owned and operated by LL Services, LLC (collectively, the "**Sites**"). For the purposes of this "**Privacy Policy**" and its disclaimers, "**you**" and "**your**" means you as the visitor of the Sites.

Scope of this Privacy Policy

This Privacy Policy describes the types of Personal Information we collect from visitors of our public Sites and our practices for using, maintaining, sharing, and protecting it. It also describes the rights and choices you may have with respect to your Personal Information and how you may contact us. This Privacy Policy does not apply to information collected that is considered Protected Health Information ("**PHI**") and/or medical information.

All information collected and stored by LL Services or added by you into that is considered PHI and/or medical information is governed by laws that apply to that information where you, the patient, are located, and are delivered via a secure platform that complies with the privacy and security standards established by the Health Insurance Portability and Accountability Act ("**HIPAA**"). LL Services uses and discloses such PHI in accordance with the LL Services "**Notice of Privacy Practices**" <https://www.llmedicalclinic.com/privacy>. LL Services will not use or disclose PHI for advertising, marketing, or other use-based data mining purposes and will not combine it with other data and will not sell it. D-identified data is not PHI. The Notice of Privacy Practices (and not this Privacy Policy) also applies to Personal Information collected on our Sites (where such occurs, if at all) if specific symptoms or health conditions is also collected, as such information may be considered PHI under HIPAA.

California and Virginia residents should read the information below about the categories of personal information to be collected from them and the purposes for which the personal information will be used.

THIS PRIVACY POLICY IS NOT A CONTRACT AND DOES NOT CREATE ANY CONTRACTUAL RIGHTS OR OBLIGATIONS.

Types of Personal Information we Collect

While using our Sites, you may provide us with certain information about you. We or our advertising partners also may automatically collect information through the use of cookies and other tracking technologies (see below).

Personal Information that we collect through your use of the Sites may include IP address, device ID, and online identifier. We may use that Personal Information and link it to Internet or other electronic network activity information, and we may draw inferences about you from the information we collect. We may

also collect your name, title, business contact information, phone number, date of birth, state, country, zip code, email address or login identification information only if you provide such information directly to us when you begin registration to use the Sites as a patient or customer or complete a web form seeking more information. This may be considered PHI, if you become a patient, and would be governed by our Notice of Privacy Practices and not this Privacy Policy.

How we Collect Personal Information

We may collect Personal Information using the following methods:

- Directly from you when you provide it to us (such as information you enter into web forms, inquiries, responses, activity on the Sites, and during registration to use Services).
- From third parties, such as analytics and email marketing service providers.
- Automatically through tracking technologies such as cookies, web beacons (also known as pixels) and log files, including over time and across our own and third-party Sites or other online services.

"Cookies" are small files that a website stores on a user's computer or device. The Sites may use cookies for various purposes, including to keep the information you enter on multiple pages together. Some of the cookies we use are "session" cookies, meaning that they are automatically deleted from your hard drive after you close your browser at the end of your session. Session cookies are used to optimize performance of the Sites and to limit the amount of redundant data that is downloaded during a single session. We also may use "persistent" cookies, which remain on your computer or device unless deleted by you (or by your browser settings). We may use persistent cookies for various purposes, such as statistical analysis of performance to ensure the ongoing quality of our services. We and third parties may use session and persistent cookies for analytics and advertising purposes, as described herein. Most web browsers automatically accept cookies, but you may set your browser to block certain cookies (see below). As required under applicable laws, we will obtain your consent necessary for utilizing cookies or similar tracking technologies.

Our Sites may use third party analytics and on-site personalization services, which use cookies, web beacons, web pixels and/or similar technology to collect and store information about you or your device or browser. You can learn more about how these third parties may handle information collected through our use of its services, and your options for controlling this activity, by visiting such third-party websites, including, but not limited to, Google Analytics, Adobe, Amazon Web Services. To inquire what third parties service providers we use, you may contact us through our contact links on the Sites.

How we Use Your Information

We may use your Personal Information for the following purposes:

- Operate, maintain, supervise, administer, and enhance the Sites, including monitoring and analyzing the effectiveness of content on the Sites, aggregate site usage data, and other usage of the Sites such as checking your eligibility and assisting you in completing the registration process.
- Provide you with a tailored and user-friendly experience as you navigate our Sites.
- Promote and market our Sites to you.

- To complete the activity you specifically asked for, e.g., receive the Services, obtain more information, request your information.
- Conduct research on users' demographics, interests, and behavior based upon information provided during use of our Sites.
- Aggregate information for analytics and reporting.
- Respond to law enforcement requests and court orders and legal process and carry out our legal and contractual obligations and enforce our rights.
- Authenticate use, detect potential fraudulent use, and otherwise maintain the security of the Sites and safety of users.
- Develop, test, improve, and demonstrate the Sites.
- De-identification.
- Any other purpose with your consent.

How we Share Your Personal Information

We may share your Personal Information with third parties, including service providers, in a variety of circumstances. This includes sharing for business purposes with vendors and service providers (such as data hosting and storage partners, analytics and advertising providers, technology and support vendors, and data security providers), as well as professional advisors like auditors, law firms, and accounting firms. If you provide information such as your name, email address, date of birth, phone number, or address through a form on the Sites or during an incomplete or failed registration, we may disclose such information to these service providers. We may also share your Personal Information with third parties at your request or with your consent; with subsidiaries or affiliates within our organization and affiliation structure; and as required to comply with applicable laws, legal obligations, judicial orders, regulatory inquiries, or law enforcement.

In addition, we may disclose Personal Information in connection with an asset sale, merger, bankruptcy, or other business transaction; to enforce our Terms of Use or other legal disclaimers; to protect the safety and security of the Sites and our users; and, through cookies and web beacons, to advertising partners to optimize marketing as further described hereunder. We also may disclose deidentified information. Note that if you make any Personal Information publicly available on the Sites, anyone may see and use such information.

Third Party Sites And Links

Our Sites may contain links to other online platforms operated by third parties. We do not control such other online platforms and are not responsible for their content, their privacy policies, or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Facebook, LinkedIn or Twitter) may also be viewable by other users of the Sites and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Sites. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of Personal Information by third parties. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

Cookies and Information Used For Advertising

On our Sites we may collect and disclose Personal Information about your online activities for use in providing you with advertising about products and services tailored to your individual interests. You may see certain ads on other Sites because we participate in advertising networks. Ad networks allow us to target our messaging to users through demographic, interest-based and contextual means. These networks track your online activities over time by collecting information through automated means, including through the use of cookies, web server logs, and web beacons. The information our ad networks may collect includes information about your visits to Sites that participate in the relevant advertising networks, such as the webpages or advertisements you view and the actions you take on the Sites. This data collection takes place both on our Sites and on third-party Sites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

You may disable or delete browser cookies through your browser settings. Cookies generally are easy to disable or delete, but the method varies between browsers. If you disable or delete cookies, or if you are running third-party software that intercepts or deletes cookies, please note that some parts or functionality of our Sites may not work properly.

Each type of web browser offers ways to restrict and delete cookies. For more information on how to manage cookies visit the appropriate web browser's website.

You can opt out of third parties collecting your Personal Information for targeted advertising purposes in the United States by visiting the [National Advertising Initiative's \(NAI\) opt-out page](#) and the [Digital Advertising Alliance's \(DAA\) opt-out page](#).

Your browser settings also may allow you to transmit a "Do Not Track" signal when you visit various Sites. Some of the Sites may not be configured to respond to "Do Not Track" signals received from browsers. To learn more about "Do Not Track" signals, you can [visit here](#).

If you have further questions regarding the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information listed below.

Minor's Privacy

Our Sites are not intended for children under 13 years of age, and we do not knowingly collect or sell Personal Information from children under 13. If you are under 13, do not use or provide any information on these Sites without your parent or guardian first providing consent in accordance with the law of your jurisdiction. If you are the parent or guardian of a child under 13 years of age whom you believe might have provided us with their Personal Information, you may contact us to request that it be deleted.

Security of Personal Information

We take steps to secure Personal Information through administrative, technical, and physical safeguards designed to protect against the risk of accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. Unfortunately, we cannot guarantee the security of information transmitted through the Internet, and where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential.

Retention of Personal Information

We generally retain records only as long as necessary and as required for our business operations, for archival purposes, and/or to satisfy legal requirements. When determining the appropriate retention period for Personal Information, we take into account various criteria, such as the amount, nature, and sensitivity of the Personal Information; potential risk of harm from unauthorized use or disclosure; purposes for which we process your Personal Information; whether we can achieve those purposes through other means; and business operations and legal requirements. Because we maintain our Sites to protect from accidental or malicious loss and destruction, residual copies of your Personal Information may be retained in our backup and archival systems for a limited period of time, after which the information will be automatically deleted or put beyond use where deletion is not possible.

International Users

The Sites are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Any information you provide to us through use of our Sites may be stored and processed, transferred between and accessed from the United States and other countries that may not guarantee the same level of protection of personal data as the one in which you reside. However, we will handle your Personal Information in accordance with this Privacy Policy regardless of where your Personal Information is stored/accessed.

Notice to California and Virginia Residents

If you are a California resident, certain Personal Information that we collect about you is subject to the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”).

If you are a Virginia resident, certain Personal Information that we collect about you is subject to the Virginia Consumer Data Protection Act (“VCDPA”).

Please note that these laws may not apply to, among other things,

- Information that is lawfully made available from federal, state, or local government records;
 - Consumer information that is deidentified or aggregated;
 - Protected health information that is collected by a covered entity or business associate governed by HIPAA;
- Medical information maintained by a provider of health care governed by California's Confidentiality of Medical Information Act (“CMIA”); or
- Information that you have explicitly authorized and requested for us to provide Services relating thereto that otherwise waives the protections of these CA and VA laws.

Collection of Personal Information

We collect 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. This type of information is referred to as “Personal Information,” and includes personal information as defined by CCPA/CPRA as well as personal data as defined by the VCDPA.

Personal Information does not include de-identified or aggregate information; publicly available information that is lawfully made available from federal, state, or local government records; and

information covered by certain sector-specific privacy laws. LL Services collects the following categories of Personal Information about consumers (and to the extent such Personal Information is subject to the CCPA/CPRA, these categories were collected in the preceding 12 months):

- **Identifiers**, Internet Protocol (IP) address, online identifier, device identifier. We may collect your name, email address, date of birth, phone number, and address only if you provided it to us via a form on the Site or during an incomplete or failed registration.
- **Commercial information**, business contact information if you have provided it to us via a form (such to register for Services, obtain more information) on the Site, including name, company name, physical address, email address, telephone, and fax number; information on actions taken on our Sites, which may include information about Sites considered and information about preferences and behavior that we collect on our Sites or purchase from third parties in order to target consumers for digital advertisements or to personalize content we deliver on our Sites.
- **Internet or other electronic network activity information**, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with the Sites, applications, or advertisements.

LL Services does not collect or share Personal Information on the Sites from any person we know to be under the age of 16. LL Services does not collect Sensitive Personal Information, as those terms are defined under the CCPA/CPRA and the VCDPA, of consumers who visit our public Sites. LL Services collects Personal Information from the following categories of sources: directly and indirectly from you, including through your interaction with the Sites; social media platforms; third-party partners such as analytics or marketing providers; automatically through tracking technologies.

Please note, if you have enabled a Global Privacy Control on your browser, our Sites are configured to recognize and respect those preferences with respect to Personal Information that falls under the CCPA/CPRA.

We may use your Personal Information for the following purposes: operate, maintain, supervise, administer, and enhance the Sites, including monitoring and analyzing the effectiveness of content on the Sites, aggregate site usage data, and other usage of the Sites such as checking your eligibility and assisting you in completing the registration process; provide you with a tailored and user-friendly experience as you navigate our Sites; promote and market our Sites to you; to complete the activity you specifically asked for; conduct research on users' demographics, interests, and behavior based upon information provided during use of our Sites; aggregate information for analytics and reporting; respond to law enforcement requests and court orders and legal process and carry out our legal and contractual obligations and enforce our rights; authenticate use, detect potential fraudulent use, and otherwise maintain the security of the Sites and safety of users; develop, test, improve, and demonstrate the Sites; or any other purpose with your consent.

LL Services will retain and/or archive Personal Information for a period of time no longer than required by applicable law or no longer than is necessary and proportionate to achieve purposes compatible with the context in which the Personal Information is collected. LL Services will not further process Personal Information in a manner incompatible with the purposes noted above.

Disclosure of Personal Information in the Preceding 12 Months

LL Services discloses Personal Information with the following categories of third parties and has disclosed the following categories of Personal Information for a business purpose, for commercial purpose, to comply with the law, in the context of a transaction, or for other business reasons:

- **Identifiers:** We may disclose IP address, device ID, or online identifier to service providers, advertising networks, internet service providers, and/or data analytics providers. We may disclose name, email address, date of birth, phone number, and address if you provided it to us via form on the Site or during an incomplete or failed registration to Service providers. We may engage in delivering online advertising that is tailored to your interests through the use of analytics and/or targeting cookies however we do not disclose your name, address, or phone number. Before using analytics and/or targeting cookies, the Sites deploy a banner seeking your consent, or opt-in, to the use of such cookies.
- **Commercial information:** Service providers.
- **Internet or other electronic network activity information:** Service providers, advertising networks, internet service providers, and/or data analytics providers

To the extent such Personal Information is subject to the CCPA/CPRA, these disclosures occurred in the preceding 12 months.

You may have the following rights regarding your Personal Information maintained by LL Services: request to know and access the Personal Information we collect, use, and disclose; request deletion of Personal Information; request to opt-out of the sale or sharing of Personal Information; right to limit use and disclosure of Sensitive Personal Information; and not receive discriminatory treatment by LL Services for exercising these rights.

The rights described below are limited to those provided under the CCPA/CPRA and VCDPA to the applicable residents of those states only. The specific rights may vary based on whether the CCPA/CPRA or VCDPA applies, and should you have any questions regarding your rights, please contact us provided hereunder.

Requests to Know and Access

You may have the right to request that we disclose to you the following information:

- Categories of Personal Information that LL Services has collected about you, disclosed about you for a business purpose, or sold or shared;
- Categories of sources from which the Personal Information is collected;
- Categories of third parties with whom LL Services shares or to whom LL Services sells Personal Information;
- The business or commercial purpose for collecting and selling Personal Information; and
- Specific pieces of Personal Information that LL Services has collected about you.

Note that you may only make a request for access twice within a 12-month period.

Requests to Delete; Request to Correct Inaccurate Personal Information

You may have the right to request that we delete or correct Personal Information associated with you, subject to applicable law and certain exceptions. Instructions for submitting a verifiable request are provided below.

Requests to Opt Out of the Sale or Sharing of your Personal Information

You may have the right to submit a request to opt out of any sale or sharing of your Personal Information or the processing of your Personal Information for purposes of targeted advertising. However, LL Services does not sell your Personal Information and does not use or share Personal Information collected from users of our public Sites to engage in targeted advertising unless you have opted-in to such use. And, in the last 12 month, LL Services has not "sold" or "shared" Personal Information (as those terms are defined under the CCPA/CPRA).

Instructions for submitting a verifiable request are provided below.

Notice to Residents of Colorado, Connecticut, Utah, Texas, Oregon, Montana, Delaware, Tennessee, Indiana, and Iowa

Similar to the above rights of California and Virginia residents, certain U.S. Territories have enacted consumer privacy law that provide resident with some, all, or other rights regarding their personal information (“**State Privacy Laws**”). If you are a resident of one of such states having State Privacy Laws, subject to applicable exceptions, you may have the following rights:

- Right to Know/Access;
- Right to Correction;
- Right to Deletion;
- Right to Data Portability;
- Right to Opt Out;
- Right to Limit Use of Sensitive Personal Information;
- Rights of Minors; or
- Right to Appeal.

To learn more about your rights if you live in one of the states listed above, instructions for submitting a verifiable request are provided below.

How to Exercise Your Rights

To submit a request to exercise any of your rights, please send an email with your name and user information with request to contact@llmedicalclinic.com.

As required under applicable law, we must take steps to verify your request before we can provide Personal Information to you, delete Personal Information, or otherwise process your request. To verify your request, we may require you to provide your name, physical address, email address, contact information, and information about your account or previous transactions with us. We may require additional information via follow-up requests. If you have only visited our public Sites and did not provide any Personal Information to us via a web form or through the registration process, we will need you to provide us with your IP address or device ID in order for us to determine if we have that information. We will not be able to determine if we have your IP address or device ID from your name, physical address, email address, contact information, or account information.

We will deliver Personal Information that we are required by law to disclose to you in the manner required by law, unless we notify you that we require additional time to respond, in which case we will respond within such additional period of time required by law. We may deliver the Personal Information to you electronically or by mail at your option. If electronically, then we will deliver the information to

the extent technically feasible and in a readily useable format that allows you to transmit the information from one entity to another without hindrance.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may designate an authorized agent to request any of the above rights on your behalf. Even if you choose to use an agent, we may, as permitted by law, require verification of the agent's authorization to act on your behalf, require you to confirm you have authorized the agent to act on your behalf, or require you to verify your own identity.

Right to Nondiscrimination

You have the right to be free from discriminatory treatment for exercising the privacy rights conferred by applicable law, including not being: denied goods or services; charged different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; provided a different level or quality of goods or services; or suggested that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Updating This Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in our privacy practices. It is your responsibility to review the Privacy Policy from time to time to view any such changes.

Contact Us

Should you have any questions about our privacy practices or this Privacy Policy, please email us at contact@llmedicalclinic.com.