

## **PRIVACY POLICY**

**www.straxrejuvenation.com**

We are committed to keeping your personal information private. Please review this Privacy Policy, our Terms and Conditions (“T&Cs”), and any other rules or policies posted to the Site that also govern your visit and use of this website (the “Site”). This Privacy Policy covers the collection, use, and disclosure of personal information that may be collected by us anytime you interact with Site, submit any information to the Site, request an appointment, contact us or use the various Services we provide, as defined below, so that you are aware of your legal rights and obligations with respect to the Site or Jade Holdings Group, LLC d.b.a. Strax Rejuvenation and any of its affiliates, parents and subsidiaries (individually and collectively, "we," "us," "our" or "STRAX").vices.

Please take a moment to read the following to learn more about our information practices, including what type of information is gathered, how the information is used and for what purposes, to whom we disclose the information, and how we safeguard your personal information.

Access to the Site is void and unauthorized where prohibited by applicable law or regulation.

### **IMPORTANT INFORMATION**

- YOU AFFIRM THAT YOU ARE EITHER AT LEAST 18 YEARS OF AGE, AN EMANCIPATED MINOR, OR POSSESS LEGAL PARENTAL OR GUARDIAN CONSENT, AND ARE FULLY ABLE AND COMPETENT TO ENTER INTO THE TERMS, CONDITIONS, OBLIGATIONS, AFFIRMATIONS, REPRESENTATIONS, AND WARRANTIES SET FORTH IN THIS PRIVACY POLICY, AND TO ABIDE BY AND COMPLY WITH THIS PRIVACY POLICY.
- IN ANY CASE, YOU AFFIRM THAT YOU ARE AT LEAST 13 YEARS OF AGE, AS THE SITE AND OUR SERVICES ARE NOT INTENDED FOR CHILDREN UNDER THE AGE OF 13. IF YOU ARE UNDER THE AGE OF 13, YOU ARE NOT ALLOWED TO USE OR EVEN ACCESS THE SITE OR OUR SERVICES.
- THIS PRIVACY POLICY APPLIES TO BOTH SERVICES DELIVERED THROUGH OUR SITE AND THE PROVISION AND DELIVERY OF TEXT MESSAGES.
- IN ACCORDANCE WITH THIS PRIVACY POLICY, YOU AGREE TO RECEIVE FREE CONTENT AND/OR PROMOTIONAL OFFERS FROM US, INCLUDING BY SMS OR TEXT MESSAGES. BY AGREEING TO THIS AGREEMENT, YOU CONSENT TO US SENDING YOU NO MORE THAN 10 SMS/TEXT MESSAGES PER MONTH. YOU MAY CANCEL AT ANY TIME BY REPLYING STOP TO THE SMS/TEXT MESSAGE YOU WERE SENT. MESSAGE AND DATA RATES MAY APPLY.
- NO DOCTOR-PATIENT RELATIONSHIP IS CREATED BY MERELY USING THE SITE INCLUDING SENDING INFORMATION THROUGH OR SCHEDULING A MEETING OR A CALL USING THE SITE.
- IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, OR ANY OF ITS TERMS, PLEASE DO NOT PROVIDE US WITH YOUR PERSONALLY IDENTIFIABLE INFORMATION (“PII”) FOR EXAMPLE YOUR FULL NAME, EMAIL ADDRESS, MAILING ADDRESS, CELL PHONE NUMBER OR ANY OTHER PERSONAL INFORMATION CAPABLE OF BEING ASSOCIATED WITH YOU INDIVIDUALLY THROUGH ONE OR MORE IDENTIFIERS.

○ UNLESS STATED OTHERWISE, OUR CURRENT PRIVACY POLICY APPLIES TO ALL INFORMATION THAT WE HAVE ABOUT YOU. THE ABOVE SENTENCE NOTWITHSTANDING, THIS PRIVACY POLICY ONLY APPLIES TO INFORMATION COLLECTED BY STRAX.

1) **Description of the Site:** The Site provides visitors (“Visitors”) with access to scheduling and information from various participating physicians and health care providers (“Physicians”). The Site is an advertisement for the Physicians and their services. All activities and capabilities offered by or through the Site shall individually and collectively be referred to as “Services”.

a) Physicians and Visitors (together “Users”) of the Site may, where and if available, submit any photograph(s), video(s), image(s), text, information or other content to the Site (“Submission(s)”).

b) We reserve the right to add, change, modify, suspend or discontinue any portion of the Site or the Service(s) offered at any time. We may also impose limits on certain Services or features and/or restrict your access to parts of the Site or to the entire Site in our sole and absolute discretion and without notice or liability to anyone.

2) **What information does the Site collect?**

a) **Visitor Activity.** Visitors to the Sites may choose to browse, search and examine any publicly available information on the Site without providing us with any PII. When you visit our Site as a visitor, we collect only information you provide or submit to the Site directly, information you send to us by email, information and messages you send or post through our accounts on third party social networks (such as Facebook, YouTube or Twitter), comments you post or messages you send through any service we may provide. The foregoing statement notwithstanding, our servers may recognize and collect Visitors’ domain names, IP addresses and any information on pages visited.

b) **Request Activity.** In order to have access to certain services and features available on the Sites, Visitors may be required to provide some PII. We may ask for and collect some PII when you request to view some pictures, when you wish to file a credit application or when you ask a callback or appointment. When providing us with any PII, you agree to provide accurate, current and complete information about yourself (“PII Data”) as prompted by our forms. PII Data may include, but is not limited to, first and last name, phone number, address and e-mail address. PII Data may also include procedure and Physician information.

c) **Content sent through the Site.** We collect any PII or Submissions that you voluntarily disclose on the Site. This may include any information you submit as part of any question you send us.

d) **Communication by text/SMS.** Our Site may identify certain communication modes available to you using text/SMS. Please be aware that all information sent to us using text/SMS is collected by us.

e) **Usage Information.** We may collect information about your usage of the Site, such as when you use the Site, the Submissions you make, the information you review, the frequency and size of data transfers, as well as information you display or click on in the Sites.

f) **Surveys & Newsletters.** We may now or in the future send or run surveys or provide newsletters to our Users. At such time we may request certain PII such as name, email address and demographic information (such as zip code, age, or location).

g) **Click-Through URLs.** In some of our email we may use a “click-through URL” linked to content on the Sites. When Users click one of these URLs, they pass through our web server before arriving at the destination web page. We may track this click-through data to help us determine interest in particular topics and measure the effectiveness of our communications.

3) **How do we use the information you provide us?** We use the PII we collect as described above to provide you with the various Services and features on the Site.

a. Any PII collected as a result of communications initiated through our Sites, are used to enable Site Services and features. For example, information collected by our servers may be used to direct communication Visitors.

b. In accordance with our T&Cs, your cell phone number may be used to provide you informational and promotional text/SMS messages from STRAX or its text message vendor.

c. We may share information collected including your PII with our agents, representatives, contractors and service providers so they can provide us with support services such as authorization of e-mail origination, text messaging vendor, marketing agent and support services.

d. Unless you opt-out, we may use your email or cell phone number to send commercial or marketing messages without your further consent. Be advised that we use your email address, SMS/text and other contact information to contact you regarding your Submissions. Your email address or cell phone number may also be required to enable some of the communication Services offered on or through our Site.

e. We may also use your email address or cell phone number without further consent for non-marketing or administrative purposes (such as notifying you of major Site changes or customer service purposes).

f. Visitors may opt-out at any time by using the unsubscribe link provided on any email or by replying STOP to any sms/text message.

g. We use both your PII and certain non-PII (such as anonymous user data, cookies, IP addresses, browser type, click stream data, etc.) to improve the quality and design of the Site and to create new features, promotions, functionalities and services by storing, tracking, analyzing and processing User preferences and trends, as well as User activity and communications.

h. We use information collected during submission of surveys and signups for newsletters to send both the information as requested and additional information about our company, Site or Services. Further, the information collected, including any demographics, is used to learn more about the types of people who visit our Sites and improve our Services.

i. If any financial information is collected it will be used to process credit applications or bill for services or features offered. If you submit a credit application, your information may be subject to verification by a credit bureau or other third party company. Unless you give us permission at the time such information is collected, this information will not be used for any purpose except for processing such application.

j. Your PII or financial information may be passed on to a third party in the event of a transfer of ownership or assets of STRAX or a bankruptcy. We may also disclose PII or financial information when we determine that such disclosure is necessary to comply with applicable law, to cooperate with law enforcement or to protect the interests or safety of STRAX or other visitors to the Site. Whenever PII or financial information is disclosed under this paragraph, we may also disclose your demographic information on a non-anonymous basis.

4. **How does STRAX Protect Users Personal Information?** We implement a variety of security measures to ensure the security of your PII on our systems.

a. **Financial Information:** When you enter sensitive financial information, we encrypt that information using secure socket layer technology (SSL).

b. Please be aware that emails or other messages you send to us (outside of any secure communication features provided within the Site) are not necessarily secure against interception and you should not include sensitive information in those messages. We generally will not ask for your credit or debit card number, password or other sensitive information in an email and you should assume that if you get such a request, it might be fraudulent.

c. **General:** 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, therefore, while we strive to use commercially acceptable means to protect your PII, we cannot guarantee its absolute security. Third parties may unlawfully attempt to intercept or access transmissions or private communications. Although we work very hard to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

## 7. Individuals under 13 years of age.

Pursuant to the provisions of the 1998 Federal Children's Online Privacy Protection Act ("COPPA"), our policy is to refuse individuals under the age of 13 to submit information to the Sites. We therefore do not knowingly collect personal information from individuals under the age of 13.

8. **Does STRAX Use Cookies?** We use "cookies" (small pieces of data we store for an extended period of time on your computer, mobile phone, or other device) to make the Site easier to use, to improve our advertising, and to protect both you and the Site. We also use cookies to record session information, customize website content and alert Users to new items of interest.

9. **How do you change PII provided or OPT-OUT?** STRAX gives Users an option for modifying or removing their information from our database. To update, modify or delete the information that we have on file for you, please contact us at the address provided below. However, please note, that while you may remove your PII from the Site at any time, you acknowledge that we may retain archived or cached copies of your PII.

10. **How Long Do We Keep your Information?** Unless you opt-out, STRAX shall maintain your contact and demographic information for marketing purposes indefinitely.

11. **Do-Not-Track.** STRAX does not currently respond to browser "do not track" signals or other similar mechanisms.

12. **California Privacy Rights:** California Civil Code Section 1798.83 allows users who are California residents to request certain information about the disclosure of their PII to third parties for direct marketing purposes. To make such a request, please contact as provided below.

13. **Changes:** By visiting and using the Site, you consent to the collection and use of information by us as set forth in this Privacy Policy. If we decide to change our Privacy Policy, we will post those changes within this page so Users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. Be sure to review our Privacy Policy, T&Cs and any rules regularly so that you will be aware of any changes to them. Please remember that your continued use of this Site, and/or maintenance of an Account after changes or revisions have been made constitute your acceptance of such updates.

14. If you have any questions about the Privacy Policy of the Site, please contact us at: Jade Holdings Group, LLC  
4300 North University Drive Suite A-202  
Lauderhill, Florida 33351  
email@straxre.com