

Needle Play Acupuncture, Inc.
Privacy Policy

This **Privacy Policy** sets out important information about how we, Needle Play Acupuncture, Inc. (“Needle Play Acupuncture” “we,” “us,” or “our”) collects, stores, protects, and uses your information when you use or interact with our Website, <http://www.NeedlePlayAcupuncture.com> (“Website”) and your choices about privacy.

Please carefully read all provisions contained in this **Privacy Policy**.

The **Terms of Use** incorporate the terms of this **Privacy Policy** therein, and the terms of the **Cookie Policy**. If you do not agree to the **Terms of Use**, this **Privacy Policy**, or the **Cookie Policy**, then you must leave our Website and not use our Services.

I. PERSONAL INFORMATION

What Personal Information Is Collected?

We collect the following Personal Information:

- (1) Name
- (2) Email Address
- (3) Phone Number
- (4) Services Requested
- (5) Reasons for Visit
- (6) Automatically Collect Information
 - a. System Data: technical information such as your IP address, type of device being used to access the Website, browser and operating system type and version, and similar system data.
 - b. Log and Usage Data: data about your usage of the Website, such as the website that referred you (if applicable), pages viewed, date and time when you access information, and other data regarding your use of the Website.
 - c. Geographic Data: what country you are accessing the Website from based on your IP address

When and How Do We Collect Your Personal Information?

We collect personal when you: (1) use our Website; (2) communicate with us through phone, mail, email and/or webforms; (3) through usage statistics, cookies, server logs, and similar technologies.

How Do We Use Your Personal Information?

Needle Play is based in the United States. Information about you will be transferred to, and processed in, the U.S. and countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country and, in some cases, may not be as protective. We have taken appropriate safeguards to require that your information will remain protected in accordance with this **Privacy Policy**.

We employ technical and organizational measures such as firewalls and encryption that are designed to appropriately protect your information that is under our control and that we process on your behalf from unauthorized access collection, use, disclosure, copying, modification or disposal, both during transmission and once we receive it. We store all information that you provide to us on secure servers. However, no method of transmission over the internet or method of electronic storage is completely secure.

We use the data we collect to help operate, improve, protect and customize our Website and Services, as well as develop new services. In addition to the other uses described in this **Privacy Policy**, your information may be used for the following purposes:

- Provide and administer the Website, including to display customized content, process transactions, and improve the performance of the Website;
- Communicate with you:
 - Responding to your questions and concerns;
 - Sending you transaction-related information;
 - Sending you information about updates to new services, new features, promotions, newsletters, and other information (which you can opt out of at any time);
- Market and administer surveys and promotions administered or sponsored by Needle Play;
- Monitor and analyze trends, usage, and activities in connection with our Website;
- Detect, investigate, and prevent fraudulent transactions, abuse, and other illegal activities;
- Perform accounting and administrative tasks, and enforce or manage legal claims; or
- As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our company

We retain the personal data we collect for so long as reasonably necessary to fulfill the purposes for which the data was collected, to perform our contractual and legal obligations, and for any applicable statute of limitations periods for the purposes of bringing and defending claims.

We do not sell, trade or rent your information collected through our Website to anyone. We may disclose your information to third parties as follows:

- With your consent for those purposes to which you have agreed, including for such purposes outlined herein;

- To its Service Providers as necessary for them to perform tasks on our behalf, including, without limitation, hosting, data analysis, email delivery, and other similar tasks;
- For mergers, acquisitions, or sale of assets as necessary; and
 - a. To courts, law enforcement agencies, and governmental authorities (i) to comply with applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public or government authorities, including public or government authorities outside your country of residence; (iv) to enforce the Terms; (v) to protect our operations; (vi) to protect our rights, privacy, safety or property, or that of you or others; or (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

How Do We Protect Your Personal Information?

Needle Play is based in the United States. Information about you will be transferred to, and processed in, the U.S. and countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country and, in some cases, may not be as protective. We have taken appropriate safeguards to require that your information will remain protected in accordance with this **Privacy Policy**.

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II. DISCLOSURES

California Residents.

California law allows California residents to ask companies with whom they have an established business relationship to provide certain information about the companies' sharing of personal information with third parties for direct marketing purposes. Needle Play does not share any California consumer personal information with third parties for marketing purposes without consent. California users who wish to request further information about Needle Play's compliance with this law or have questions or concerns about our privacy practices may contact us using the contact information set forth below. This information is obtainable free of charge once a year.

1. CCPA Privacy Notice

The California Code of Regulations defines a "Resident" as:

- (1) Every individual who is in the State of California for other than a temporary or transitory purpose and

- (2) Every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

Anyone outside this definition is a “Non-Resident.”

We collect the following categories of personal information:

- (1) Identifiers: contact details (such as, real name, alias, postal address, telephone number, or mobile contact number, unique personal identifier, online identifier, IP address, email address and account name)
- (2) Personal Information Categories Listed in the California Customer Records Statute: Name, contact information, education, employment, employment history and financial information
- (3) Protected Classification Characteristics Under California or Federal Law: Gender and date of birth

Needle Play may also collect other personal information outside of these categories instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Website and Services and to respond to your inquires.

Regarding your personal information, you have the right to know:

- Whether we collect and use your personal information;
- The categories of personal information we collect;
- The purpose for which the collected personal information is used;
- Whether we sell your personal information to third parties;
- The categories of personal information we sold or disclosed for a business purpose;
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- The business or commercial purpose for collecting or selling personal information.

You can ask for your personal information to be deleted. We will respect your request and delete your personal information, subject to certain exceptions provided by law.

Other privacy rights you have under the CCPA include:

- Objecting to the processing of your personal information;
- Requesting correction to your personal information if it is incorrect or no longer relevant;
- Designating an authorized agent to make a request under the CCPA on your behalf.

- Requesting to opt-out from future selling of your personal information to third parties.

Needle Play will not discriminate against you if you exercise your privacy rights.

Needle Play will use and share your personal information in accordance with this **Privacy Policy**.

If you are a California Resident and have CCPA requests, please contact us at:

Attn:

Dr.Marcos@NeedlePlayAcupuncture.com

Please use “California Privacy Rights” in the subject line.

GDPR Residents.

Needle Play’s Website is hosted and operated in the United States and elsewhere in the world. By using the Website, you consent to the transfer of your personal information to the United States. If you are accessing the Website from outside the United States, please be advised that United States law may not offer the same privacy protections as the law of your jurisdiction.

If you are a resident in the European Economic Area (“EEA”), including the European Union, United Kingdom, and/or Switzerland, you have the right to access, rectify, or erase any personal data we have collected about you. You also have the right to data portability and the right to restrict or object to our processing of personal data it has collected about you. You may withdraw your consent at any time for any data processing we do based on consent you have provided to it. To exercise any of these rights, contact us as set forth in the section “Contact Us” below and specify which right you intend to exercise. We will respond to your request within 30 days. We may require additional information from you to allow us to confirm your identity. Please note that we may store information as necessary to fulfill the purposes for which it was collected, and may continue to retain and use the information even after a data subject request for purposes of our legitimate interests, including to comply with its legal obligations, resolve disputes, prevent fraud, and enforce its agreements. Personal data collected within the EEA may be transferred and processed by third parties located in a country outside of the EEA. In such instances, we will ensure that the transfer of your personal data is carried out in accordance with applicable privacy laws. If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority.

Do Not Track. We do not currently recognize or respond to browser-initiated Do Not Track signals. There is no finalized uniform technology or consistent industry standard for recognizing and implementing Do Not Track signals.

Changes To This Privacy Policy. This **Privacy Policy** is current as of the Effective Date set forth below. We reserve the right from time to time to amend or change this **Privacy Policy** at any time and without direct notice to you. Any amendments or changes to this **Privacy Policy**

will be noticed by the Last Updated and Effective Date detailed below. You are responsible for periodically reviewing this **Privacy Policy** to see if there have been any amendments or changes.

If you continue to use our Website following any amendments or changes, that signifies your assent to and acceptance of any such amendments or changes.

III. COOKIE POLICY

We use browser cookies and similar information-gathering technologies on our Website.

You may view our **Cookie Policy** [HERE](#). The provisions of the **Cookie Policy** are hereby incorporated by reference herein.

IV. THIRD-PARTY WEBSITES

This **Privacy Policy** does not address, and we are not responsible for the privacy, information or other data collection, storage and use practices of any third party to which the website links, any wireless carriers, or any other third parties who provide services in connection with your access and use of the website. We recommend you review the privacy policies of each third-party site, wireless carrier, or service provider prior to using the website. The inclusion of a link on the website does not imply our endorsement of, or affiliation with the site.

V. CONTACT US

For any questions, comments or concerns about this **Privacy Policy**, the practices of our Website, or dealings with our Website, you can contact Needle Play at the following:

Attn:
Dr.Marcos@NeedlePlayAcupuncture.com

Please use “Privacy Policy Inquiry” in the subject line.

Last Updated: December 15, 2023
Effective Date: April 4, 2022