

# Privacy Policy

## Midtowne Wellness and Aesthetics Website

Privacy is a fundamental right, and we've drafted this Privacy Notice to inform you on how we handle the Personal Information of the visitors ("you") to this website (the "Site"). This Privacy Notice outlines the legal basis on which we process your Personal Information and provides other information as required by privacy laws and regulations around the world.

You are strongly encouraged to read this Privacy Notice so that you may understand our use of your Personal Information, our obligations to you, and your privacy rights.

### 1. Consent

Except as required or permitted by applicable data protection laws, we will not collect, use or disclose your Personal Information for any purpose for which you refuse us consent or later withdraw your consent. You may at any time withdraw your consent *with future effect*, and without affecting the lawfulness of processing of your Personal Information based on the consent you provided before you withdrew it.

If you withdraw consent, you agree that despite this withdrawal we may continue to use the Personal Information previously provided to us (i) to the extent that we are contractually obligated to do so, (ii) to the extent necessary to enforce any contractual obligations you may have to Midtowne Wellness and Aesthetics, for any legitimate purpose (including fraud prevention) permitted by applicable data protection laws. If you withdraw your consent to use and disclose this information, we may no longer be able to communicate with you, including any request that we provide you with the Services, consider any offer of goods or services from you, or consider your application for employment.

### 2. What is Personal Information?

"Personal Information" is broadly defined to include all information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. Personal Information could be as simple and direct as your name, but it could also be less explicit like how a certain individual interacted with a website or an advertisement.

### 3. Your Privacy Rights at Midtowne Wellness and Aesthetics



We believe in the fundamental right to privacy and that your rights should not differ based on where you live. Accordingly, no matter your residency, you have the following rights with respect to the Personal Information that we collect, use or share:

Right to be Informed	The right to be informed about the collection and use of your Personal Information.
Right to Access	<p>The right to be provided with a copy of your Personal Information held by us, including</p> <ul style="list-style-type: none"><li>○ the categories of Personal Information we collected about you, if any;</li><li>○ the categories of sources for the Personal Information we collected about you;</li><li>○ our business or commercial purpose for collecting that Personal Information;</li><li>○ the categories of third parties with whom we share that Personal Information;</li><li>○ the specific pieces of Personal Information we collected about you; and</li><li>○ a list of Personal Information categories that were disclosed for business purposes.</li></ul>
Right to Rectification	The right to require us to correct your Personal Information if it's inaccurate or incomplete.
Right to be Forgotten / Right to Deletion	The right to require us to delete your Personal Information where there is no compelling reason for its continued processing.



Right to Restriction of Processing	The right to require us to stop processing your Personal Information but still allow us to hold onto it.
Right to Data Portability	The right to receive the Personal Information you provided to us, in a structured, commonly used, and machine-readable format or transmit that Personal Information to a third party—in certain situations.
Right to Object	The right to object to our continued processing of your Personal Information.
Right to No Discrimination	The right not to be discriminated against for exercising any of your rights.
Right to Appeal	The right to appeal a decision we have made regarding your Personal Information.
Right to Opt Out Of	<p>Automated Individual Decision-Making (and Profiling): The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or significantly affects you.</p> <p>Targeted Advertising &amp; Sale of Data: The right not to have your Personal Data used for purposes of targeted advertising, and the right to not have your Personal Data sold.</p>
Right to Lodge a Complaint with your Supervisory Authority	The right to complain about the breach of your rights to a competent data protection authority.

To exercise your rights, you may reach out to us by email at [support@midtownnewellnessaesthetics.com](mailto:support@midtownnewellnessaesthetics.com) If you live in California, you or your



authorized agent can also reach us by calling our toll-free number at (469) 898-0065. You also have the right to approach the competent data protection authority with your request or complaint. If you live within:

- Canada, you may contact the Office of the Privacy Commissioner at [Contact the OPC – Office of the Privacy Commissioner of Canada](#).
- United States
  - California, you may contact the California Department of Justice's Privacy Unit at [State of California – Department of Justice – Office of the Attorney General](#).
  - Virginia, you may contact the [Attorney General of Virginia](#).
- the European Economic Area (EEA), a list and contact details of local data protection authorities is available [on this website](#).
- the United Kingdom (UK), you may contact the UK Information Commissioner's Office at [Contact us | ICO](#).

If for whatever reason you are unsure of which competent data protection authority is applicable in your circumstances or you are unsure of how to contact such authority, let us know, and we'll try to help you.

#### **4. Why We Collect Personal Information**

We only collect the Personal Information that we need, and we only use it in the ways we've specifically set out in this Privacy Notice. The Personal Information we collect depends on how you've interacted with us. We collect Personal Information from you for three central reasons:

- To respond to you, after you have made initial contact with us when making an inquiry, sharing a comment or concern, or applying for a job with us;
- To provide you with services, such as to review your inquiries; process, maintain, and respond to your inquiries; and to provide you with services that we think you'll like based on any request that you have made;
- For advertizing, of our services; and,
- For analytics, such as to understand how visitors including you use the Site, and to improve the Site.

#### **5. How We Collect Personal Information**

The Personal Information that we collect varies depending on the nature of and reason for your interaction with us. We collect Personal Information:



- when you access the Site or seek information regarding our Services, solicit us for the provision of services, or enquire about or pursue employment opportunities posted on our Site;
- we may use your Personal Information to address your requests, enquiries, and complaints;
- when you connect with us through social media; and,
- when we leverage or collect cookies, device IDs, location data from the environment, and other tracking technologies.

## **6. Who is Your Data Controller?**

Midtowne Wellness and Aesthetics is the data controller for the processing activities described in this Privacy Notice.

## **7. Legal Basis of Processing**

We process your Personal Information because such processing is necessary for:

- exercising our rights and performing our obligations under any contract we make with you;
- compliance with our legal obligations; and,
- legitimate interests pursued by us, which generally involves the efficient performance and management of our business relationship with you.

## **8. What Personal Information Do We Collect?**

### **(a) Categories of Personal Information Collected**

Within the last twelve months, we've been provided with the following categories of Personal Information from visitors to the Site:

- Identifiers and contact information, including your name, address, phone number, email address, and other similar information;
- Device and Internet activity information, including information about your computer and browsing activity. This information may include IP addresses, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information. It may also include information related to when and how you access and use our Site, such as the date and time of your visit, how you navigate and what you search for using our Site, the Site's pages, and items you view using our Site; and,



- Professional or employment-related information, including for employment candidates, current or past job history or performance evaluations.

If you have any questions about the information we collect, please reach out to us.

**(b) Marketing Communications**

If you submit a request to be contacted on the Site, or an application for employment, you're consenting to receive electronic promotional materials or information (referred to as Commercial Electronic Messages). You may withdraw your consent to the receipt of CEMs at any time.

**(c) Cookies and Device Identifiers**

Please see our [Cookies Notice](#).

**(d) Site Usage Information**

Like most websites, this Site gathers traffic patterns, site usage information and other aggregated data in order to evaluate our visitors' preferences and the effectiveness of our Site. This aggregate usage data does not identify you individually. We may share anonymous, aggregated statistics about visitors to our Site with others outside our company, or we may allow third-parties to collect aggregate data through our Site.

**(e) Do Not Track Requests**

We currently do not respond to Do Not Track (DNT) signals.

**9. How We Share your Personal Information**

We do not sell Personal Information and have not done so in the past 12 months. We will not share your Personal Information, except:

(a) to third parties performing clearly-defined sub-processing functions on our behalf (such as analyzing data, providing marketing assistance, providing recruitment assistance, providing search results and links, and verification of data provided by you). Any processing of your Personal Information by these sub-processors will be protected by an agreement regarding privacy and data security;

(b) where we are required by law to disclose Personal Information; in connection with any legal proceedings or prospective legal proceedings;

(c) in order to establish, exercise or defend our legal rights;



(d) to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling. We will require any person or entity to whom we provide your Personal Information to agree to comply with our then current Privacy Notice. We will take reasonable commercial efforts to ensure that they comply with our Privacy Notice; and,

(e) in the event of a transfer of ownership or assets, or a bankruptcy, of Midtowne Wellness and Aesthetics or any of its affiliates.

## **10. How We Protect Your Information**

To protect your Personal Information against accidental or unlawful destruction, loss, use, or alteration and against unauthorized disclosure or access, we use appropriate physical, technical and organizational security measures.

## **11. Your Rights to Access, Portability, and to be Forgotten**

If you make a request to exercise any of these rights, we will honour your request within 30 days. If we need more time, we will notify you as soon as possible.

Before you receive the disclosure, we must be able to identify you. Accordingly, you are required to provide sufficient proof of your identity to ensure the safety and security of your Personal Information. We will not provide you, edit, or delete your Personal Information if we cannot verify your identity or authority to make the request. You must also describe your request with sufficient detail to allow us to properly understand, evaluate and respond to you. If we deny or partially deny your request, you have a right to be provided reasons as to why your request was not fully granted.

To exercise the access, data portability and deletion rights described above, please submit a valid consumer request to us at [support@midtownewellnessaesthetics.com](mailto:support@midtownewellnessaesthetics.com)

### **(a) Your Right to Access**

The disclosure of information will be provided to you free of cost. If your access request is manifestly unfounded or excessive, in particular because of the requests repetitive character, then we may levy a charge to cover our administrative expenses.

We reserve the right to decline your request where the information requested:

- would disclose Personal Information of another individual or of a deceased individual;



- is subject to legal privilege;
- is personal health information that was not provided to us directly by the individual requesting access;
- is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information;
- does not exist, is not held, or cannot be found by us, could reasonably result in serious emotional harm to the individual or another individual, or serious bodily harm to another individual; or,
- may harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by statute to perform such functions.

We also will not disclose the Personal Information where a law of your country, state, province, or other subnational entity would bar such disclosure. We will refuse repetitious or vexatious requests for access.

#### **(b) Your Right to Data Portability**

If we provide you access to your Personal Information, we will provide it to you in a structured, commonly used, and machine-readable format. If you made your request electronically, we will provide access in electronic form unless you request otherwise. Your request may also be delivered by mail. This format will be, to the extent technically feasible, in a readily usable format that allows you to transmit this information to another entity without hindrance.

#### **(c) Data Retention and the Right to be Forgotten**

We do not hold onto your data forever. Instead, our default is to retain your Personal Information:

- until it is no longer necessary for the purposes for which it was collected or otherwise processed;
- to comply with legal obligations (such as retention obligations under employment, tax or commercial laws); or
- until you request that we delete it.

If you make a deletion request (see Exercising Access, Data Portability and Deletion Rights), we will delete (and direct our service providers to delete) your Personal Information from our records, unless we or our Service Providers must retain your Personal Information to:



- complete the enquiry for which your Personal Information was collected, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- comply with any legal obligation; or,
- make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **12. We May Change this Privacy Notice**

In order to maintain or enhance the services we provide to you it might be necessary to change this Privacy Notice from time to time. We reserve the right to modify this Privacy Notice at any time, subject to applicable data protection laws. Please visit the Site from time to time for the latest version of this Privacy Notice.

## **13. Data Privacy Contact**

If you have any questions regarding this Privacy Notice or the privacy practices of Midtowne Wellness and Aesthetics or its subprocessors, or if you require assistance to withdraw your consent to our processing of your Personal Information or wish to request that your Personal Information be deleted, please contact us by sending an email to [support@midtownewellnessaesthetics.com](mailto:support@midtownewellnessaesthetics.com) or writing to us at 517 N. 8th Street Midlothian TX 76065 Attention: Data Protection Officer.