



Privacy Policy

Effective Date: September 2026

GNO Holdings, Inc. dba Retra Health

IF YOU ARE EXPERIENCING A MEDICAL EMERGENCY, CALL 911 IMMEDIATELY.

Introduction

This Privacy Policy ("Privacy Policy") describes the data protection practices of GNO Holdings, Inc. dba Retra Health (henceforth, "Retra Health") ("Retra Health," "we," "our," or "us") when you interact with us, our application(s), or, website(s). For the purposes of this Privacy Policy, "Personal Information" refers to any information that is linked or reasonably linkable to an identified or identifiable natural person.

We refer to the Websites, and other services provided by Retra Health together in this Privacy Policy as the "Services." This Privacy Policy is incorporated into our Terms of Use. All capitalized terms used in this Privacy Policy but not defined herein have the meanings assigned to them in the Terms of Use.

If you are a California resident, please review the section regarding Privacy Information for California Residents herein for state-specific rights.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE THE SERVICES.

This Privacy Policy contains the following sections:

- The Information We Collect and the Sources of Such Information
- Purposes for How We Use Your Information
- Online Analytics and Advertising
- How We Share and Disclose Your Information
- Your Marketing Choices
- Health Information and Third-Party Services
- How We Protect Your Information
- Privacy Information for California Residents
- Retention of Your Information
- Revisions to Our Privacy Policy
- Contacting Us

The Information We Collect and the Sources of Such Information

We obtain Personal Information about you through the means discussed below when you use the Services. Please note that we need certain types of Personal Information so that we can provide the Services to you. If you do not provide us with such information, or ask us to delete it, the Services may not function as intended.

1. Information You Provide to Us

We collect a variety of Personal Information that you provide directly to us. For example, we collect Personal Information from you through:

- Account and product registration and administration of your account
- Processing your orders and requests for treatment
- Questions, communications, or feedback you submit to us via forms or email
- Requests for customer support and technical assistance, including through online chat functionalities
- Uploads or posts to the Services
- Employment applications you submit

The specific types of Personal Information we collect will depend upon the Services you use, how you use them, and the information you choose to provide. The types of Personal Information we collect directly from you may include:

- Name, address, telephone number, date of birth, and email address
- Information about your medical conditions, treatment options, physician referrals, lifestyle and personal preferences, prescriptions, genetics, medical photos, and lab results or other related health information, such as your physical and emotional characteristics
- Log-in credentials if you create an account
- Billing information, such as shipping address, credit or debit card number, verification number, and expiration date, collected by our payment processors on our behalf
- Identity verification information (e.g., driver's license or other government-issued ID card or number), and your signature (if required for notarization purposes)
- Information about purchases or other transactions with us
- Information about your customer service and maintenance interactions with us
- Demographic information such as your gender, race/ethnicity, and age, marital status and number of children, and similar information in connection with the Services
- Information about others, such as if you share a family or friend's email address or contact information to allow access to your information or name them as an emergency contact
- User-generated content you post in public online forums on our Services or share with other users
- Any other information you choose to directly provide to us in connection with your use of the Services.

2. Information We Collect Through Automated Means

We collect certain information about your use of the Services and the devices you use to access the Services, as described in this Section. As discussed further below, we and our service providers (which are third party companies that work on our behalf), may use a variety of technologies, including cookies, SDKs, and similar tools, to assist in collecting this information.

Our websites. When you use our Website and app, we collect and analyze information such as your IP address, device types, browser types, browser language, operating system, the state or country from which you accessed the Services, software and hardware attributes (including device IDs) referring and exit pages and URLs, platform type, the number of clicks, files you download, App usage, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the terms you use in searches on our Services, the date and time you used the Services, error logs, and other similar information.

Location Information. When you use the Services, we and our service providers may automatically collect general location information (e.g., IP address, city/state and or postal code associated with an IP address) from your computer or mobile device. This information allows us to enable access to content that varies based on a user's general location (e.g., to provide you with accurate sales tax information and to deliver content customized to your location).

We will ask your permission before collecting your precise GPS location information. In such instances, we will use your precise geo-location information to provide customized services, content, promotional offers, and other

information that may be of interest to you. If you no longer wish for us and our service providers to collect and use GPS location information, you may disable the location features on your device. Please see your device manufacturer settings.

Our Use of Cookies and Similar Online Tools. To collect the information discussed in this Section, we and our service providers use web server logs, cookies, tags, SDKs, tracking pixels, and other similar tracking technologies. We use these technologies to offer you a more tailored experience.

- A web server log is a file where website activity is stored
- An SDK is a set of tools and/or code that we embed in our Apps and software to allow third parties to collect information about how users interact with the Services
- A cookie is a small text file that is placed on your computer or mobile device when you visit a site, that enables us to: (i) recognize your computer/device; (ii) store your preferences and settings; (iii) understand the parts of the Services you have visited and used; (iv), enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform searches and analytics; and (vi) assist with security and administrative functions
- Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email that are designed to: (1) collect usage information like ad impressions or clicks and email open rates; (2) measure popularity of the Services and associated advertising; and (3) access user cookies

As we adopt additional technologies, we may also gather information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information (e.g., [Internet Explorer](#); [Google Chrome](#); [Mozilla Firefox](#); or [Apple Safari](#)). Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Services.

3. Information We Collect from Social Media and Other Content Platforms

When you "like" or "follow" us on Facebook, Instagram, Twitter, or other social media platforms, we may collect some information from you including your name, email address, and any comments or content you post relevant to us. We also collect your information if you sign up for one of our promotions or submit information to us through social media platforms.

- If you access the Services through a third-party connection or log-in (e.g., through a social network or third-party authentication tool), you may allow us to have access to and store certain information from such third parties depending on your settings on such services. If you do not wish to have this information shared, do not use these connections to access the Services. For a description of how these third parties handle your information, please refer to their privacy policies and terms of use, which may permit you to modify your privacy settings.

Similarly, if you choose to connect your App to third-party platforms or tools, or with other apps on your device (e.g., health or fitness monitoring platforms or tools, or your contacts, photos, or calendar), such third parties and tools may allow us to have access to and store additional information as it relates to your use of the Services (e.g., to integrate your fitness data within the Services or access your calendar to help you schedule an appointment). If you do not wish to have this information shared, do not initiate these connections.

4. Information We Receive from Other Sources

We work closely with third parties (including, for example, third party intermediaries, such as physicians, medical professionals, and pharmacies to provide you with the Services, as well as with advertising networks, analytics providers, marketing partners, and search information providers). Such third parties will sometimes provide us with additional Personal Information about you.

Purposes for How We Use Your Personal Information

In connection with providing, you with the Services, we may use your Personal Information for our business purposes to:

- Carry out, improve, and manage the Services and, as applicable, facilitate the provision of health care services to you by physicians or other health care providers and ensure that the physicians or health care providers have the services and support necessary for health care operations.
- Engage in internal research to understand the effectiveness of our Services, improve our Services, and better understand our user base. If we publish or provide the results of this research to others, such research will be presented in a de-identified and aggregate form such that individual users cannot be identified
- Communicate with you about the Services, your use of the Services, or your inquiries related to the Services and send you communications on behalf of physicians or other health care providers utilizing the Services to meet your needs
- Communicate with you (in accordance with applicable legal requirements) by email, postal mail, or phone about surveys, promotions, special events or our products and Services and those of our subsidiaries, affiliates, and parent companies and any of their related businesses and those of our third-party partners
- Provide you with technical support and customer service and troubleshoot any technical issues or errors
- Verify your identity and administer your account, including processing your payments, fulfilling your orders, and verifying the authenticity of your government-issued identification photo
- Ensure that content from our Services is presented in the most effective manner for you and for your computer or device, allow you to participate in interactive features of our Services (when you choose to do so), and as part of our efforts to keep our Services safe and secure
- Provide you with more relevant advertisements and personalized content, and measure or understand the effectiveness of advertising and content we serve to you and others, and to deliver and customize relevant advertising and content to you
- Help us better understand your interests and needs, such as by engaging in analysis and research regarding use of the Services
- Comply in good faith with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others
- Establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others, such as protecting against malicious, fraudulent, or illegal activity

Combined Information. For the purposes discussed in this Privacy Policy, we may combine the Personal Information that we collect through the Services with information that we receive from other sources, both online and offline, and use and share such combined information in accordance with this Privacy Policy.

Aggregate/De-Identified Data. We may aggregate and/or de-identify any information collected through the Services so that such information can no longer reasonably be linked to you or your device and is no longer considered Personal Information ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors.

Online Analytics and Advertising

1. Online Analytics

We may use third-party web analytics services (such as those of Google Analytics (including Google Signals, Google User-ID, and other Google Analytics features) and Mix Panel) on our Services to collect and analyze usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; try to locate the same unique users across multiple browsers or devices to better tailor services and features; and provide certain features to you. If you have a Google account with personalized advertising enabled, through Google Signals, Google will also be able to gather for us analytics and engagement information from across the various devices you use to access the Services. To prevent Google from using your information for analytics (including cross-device tracking for personalization purposes), you may install the Google Analytics Opt-out Browser Add-on by [clicking here](#). And to opt out of Google Signals, please open your "Settings" app, locate, and tap "Google," select "Ads," and turn ON "Opt-out of Ads Personalization." You may also be able to disable cross-device tracking through your Android or Apple device-based settings.

If you receive email from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

2. Online Advertising

The Services may integrate third-party advertising technologies (e.g., ad networks and ad servers such as Facebook, Google Ad Words, TikTok, Criteo and others) that use cookies, pixels, and other technologies to deliver relevant content and advertising for our products on the Services, as well as on other websites you visit and other applications you use. The ads may be based on various factors such as the content of the page you are visiting, information you enter such as your searches, demographic data, and other information we collect from you. These ads may be based on your current activity or your activity over time and across other websites and online services.

- We sometimes provide our customer information (such as email addresses) to service providers, who may "match" this information in de-identified form to cookies (or mobile ad identifiers) and other proprietary IDs, to provide you with more relevant ads when you visit other websites and mobile applications. We may also share customer information such as your email address with third-party advertising networks that use such information to better target advertising to you regarding our products and services, as well as other products and services, as you browse the internet.

We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed on your device you use to access the Services by non-affiliated third-party advertising network services. To opt out of Google Analytics for display advertising or customize Google display network ads, visit the [Google Ads Settings page](#). To [update your advertising preferences with Facebook, click here](#). To [update your advertising preferences with TikTok, click here](#). We do not control these opt-out links, whether these opt-out links change over time, or whether any company chooses to participate in the industry opt-out programs listed above. We are not responsible for any choices you make related to third-party links available through the Services.

- Please note that if you exercise the opt out choices above, you will still see advertising when you use the Services, but it will not be tailored to you based on your online behavior over time. Please note that if you exercise the opt out choices above, you will still see advertising when you use the Services, but it will not be tailored to you based on your online behavior over time.

3. Mobile Advertising

When using mobile applications from us or others, you may also receive tailored in-application advertisements. We may use third-party service providers to deliver advertisements on mobile applications or for mobile application analytics. Each operating system, iOS for Apple phones, Android for Android devices, and Windows for Microsoft devices provides its own instructions on how to prevent the delivery of tailored in-application advertisements. We do not control how the applicable platform operator allows you to control receiving personalized in-application advertisements; thus, you should contact the platform provider for further details on opting out of tailored in-application advertisements. You may review the support materials and/or the device settings for the respective operating systems to opt-out of tailored in-app advertisements.

4. Notice Concerning Do Not Track

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our websites for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser initiated DNT signals. To [learn more about Do Not Track, you can do so here](#). Nevertheless, we strive to recognize universal opt-out signals where legally required.

5. Information We Receive from Other Sources

We work closely with third parties (including, for example, third party intermediaries, such as physicians, medical professionals, and pharmacies to provide you with the Services, as well as with advertising networks, analytics providers, marketing partners, and search information providers). Such third parties will sometimes provide us with additional information about you.

How We Share and Disclose Your Information

We may share your information for our business purposes in the following ways:

- **Affiliates and Subsidiaries.** We may share information we collect within website to deliver products and services to you, ensure a consistent level of service across our products and services, and enhance our products, services, and your customer experience.
- **Health Care Providers and Services.** We share your information with third-party health care providers: (i) to schedule and fulfill appointments and provide health care services as part of the Services, (ii) to whom you send messages through our Services, and (iii) for other treatment, payment, or health care operations purposes, including pharmacy services, upon your request.
- **Service Providers.** We provide access to or disclose your Personal Information to select third parties who use the information to perform services on our behalf. They provide a variety of services to us, including billing, content/service enhancements, sales, marketing, advertising, analytics, research, customer service, shipping and fulfillment, data storage, IT and security, fraud prevention, payment processing, and auditing, consulting, and legal services. These entities may also include health care organizations, pharmacies, and other third parties we use to support our business or in connection with the administration and support of the Services.
- **Advertising Networks.** Please see the "Online Advertising" section above for details about how we share information with advertising partners.
- **Joint Product/Marketing Partners.** These are entities that jointly offer or provide services or products with us. These entities collect and use data in accordance with their own terms and privacy policies.
- **Protection of Company and Others.** By using the Services, you acknowledge and agree that we may access, retain and disclose the Personal Information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a subpoena or court order); (b) enforce our Terms of Use, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for customer service; and/or (e) protect the rights, property

or personal safety of its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

- **Business Transfers.** As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions, (including in contemplation of such transactions) user Personal Information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third-party, customer Personal Information (including your email address) would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.
- **Public Forums/User Interactions.** Certain features of our Services make it possible for you to share comments publicly or with other users. We may use any Personal Information that you post publicly is not confidential, and we may use it for any purpose (including in testimonials or other marketing materials). For example, if you submit a product review on one of our websites, we may display your review (along with the name provided, if any) on the Websites and on third-party websites. Any information you post openly in these ways will be available to the users you shared it with and potentially the public at large and may be accessible through third-party search engines. Accordingly, please take care when using these features. We are not responsible for how others use the information about you that you share with them through the Services.
- **Testimonials/Reviews.** We may, directly or indirectly, via phone, email, third-party application, and other methods, solicit or invite you to submit product or service reviews, written, video, or otherwise. If you choose to submit information in response to this solicitation, including name, likeness, image, product or service review, or any other materials, you consent to our use of your name, likeness, and other information in marketing materials, or testimonials on our website or third-party websites.
- **Consent.** We may also disclose your information in other ways you direct us to and when we have your consent.
- **Aggregate/De-Identified Information.** We reserve the right to create Aggregate/De-Identify Data collected through the Services and our disclosure of such Aggregate/De-Identified Data is in our discretion.

Your Rights and Choices

Depending on the state in which you live, you may have legal rights with respect to your information. The types of requests you may be able to make are as follows:

- Information about the categories of information we process, our uses of your information, our sources of such information and our disclosure of such information
- Access to the information that we have collected about you and a copy of certain information in a portable format
- Correct certain information we have about you
- Deletion of the information we have about you.

You may make a request by sending us an email at the email address below.

Before we disclose, correct or delete information in response to any of these requests, we will need to verify your identity. Depending on the nature of your request, we may contact you for further information if appropriate to verify your identity. Note, however, that we will never ask you for sensitive personal or financial information when verifying your identity, and no employee will ask you to tell them your password. If you are an authorized agent submitting a request on their behalf, we may require proof of the written authorization you have received before processing the request.

Certain information may be exempt from such requests under applicable law. For example, if the request prevents us from completing a transaction you initiated, interferes with our legal obligations, affects legal matters including a customer user's rights to data contained in their account, we cannot verify your identity, or compliance with your request is not legally required and would involve disproportionate cost or effort. But in any event, we will respond to your request within a reasonable timeframe and provide you with an explanation. If we deny your request in whole or in part, the laws in your jurisdiction may provide you with rights to appeal our response. If applicable, we will provide you with information about your appeal options in our response to you.

We will not discriminate against anyone that makes a rights request, but in some cases, we will not be able to provide our Services to you without that information.

Depending on applicable law, you may have the right to appeal our decision to deny your request, if applicable. We will provide information about how to exercise that right in our response denying the request. You also may have the right to lodge a complaint with a supervisory authority.

Opt-out of sale of and disclosure of information for online targeted advertising.

As explained in the Online Analytics and Advertising section above, and subject to applicable laws as discussed further below, we allow third parties to receive certain information such as cookies, IP address, device identifiers, hashed contact information, browsing behavior, and/or other activity to enable the delivery of targeted advertising to you. These activities may qualify as the "sale" of personal information or "sharing" or processing of personal information for targeted advertising, as defined in applicable law.

Residents of certain states may opt out of the sale of personal information or sharing or processing of their personal information through cookies, pixels, and similar online tools for targeted advertising. If you have a legally recognized browser-based opt out preference signal turned on via your device browser (such as Global Privacy Control), we recognize such preference in accordance and to the extent required by applicable law. Note, if you use a cookie blocker such as Ghostery, it may block visibility of this tool. You can also use an authorized agent to submit a request to opt-out on your behalf if you provide the agent written permission to do so. We may require the agent to submit proof that you have authorized them to submit an opt-out request.

In addition to advertising activities using cookies and pixels, we may also share user email addresses with advertising partners to provide you with more relevant advertising. To opt out of this activity, send us an email at the email address below

- If you opt out, you may still receive advertising, it just may not be tailored to your interests. Please note, if you use different browsers, devices, or services you will need opt out on each browser or device where you want your choice to apply.

Your Data Rights

You have rights to your data. You have the right to be informed as to how we use your data and the rights to access, rectify, erase, restrict processing. You have the right to data portability and the right to object to data transfer or usage. To exercise your data rights, or for questions about usage of your data, please contact us at the contact information below.

Your Marketing Choices

You may instruct us not to use your contact information to contact you by email, postal mail, or phone regarding products, services, promotions, and special events that might appeal to your interests by contacting us using the information below. In commercial email messages, you can also opt out by following the instructions located at the bottom of such emails. Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Policy or as required by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you.

Sensitive Data Opt-Out/Opt-In Right.

To provide you with more relevant online advertising regarding our products and services, as described immediately above, we may use information about the treatments you have requested or received and similar information.

- This may include the processing of information that is considered "sensitive data" or "sensitive personal information" under applicable laws, such as health information and information about sex life and sexual orientation (collectively referred to herein as "sensitive data").
- You have a right to limit our use of sensitive data for purposes other than to provide the services or goods you request or as otherwise permitted by law, including our and our partner's processing of sensitive data for tailored advertising purposes.

- To opt-out from such additional purposes send us an email or use the Global Privacy Control described above. Depending on your jurisdiction, we may ask for your consent before using your sensitive data.
- If you consent and subsequently change your mind, you can opt out at any time.

Collection of Children's Data

Our Services are not directed to or intended for use by anyone under the age of 16. We do not knowingly collect Personal Information from anyone under the age of 16.

If we become aware that a child under the age of 16 has provided us with Personal Information, we will take steps to delete that information. If you become aware that a child under the age of 16 has provided us with Personal Information, please contact us as described below.

Retention of Your Information

We keep your information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

Revisions to Our Privacy Policy

We reserve the right to change this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. We will make the revised Privacy Policy accessible through the Services, so you should review it periodically. The date this Privacy Policy was last revised is identified at the top of the document. You are responsible for periodically monitoring and reviewing any updates to the Privacy Policy. If we make a material change to the Privacy Policy, we will provide you with appropriate notice in accordance with legal requirements. Your continued use of our websites after such amendments (and notice, where applicable) will be deemed your acknowledgment of these changes to this Privacy Policy.

Health Information and Third-Party Services

This Notice of Privacy Practices ("Notice") describes how we may use and disclose your Protected Health Information (PHI) to carry out treatment, payment, or healthcare operations and for other purposes that are permitted or required by law. This Notice also describes your rights regarding your PHI. We are required by law to maintain the privacy of your PHI, provide you with this Notice of our legal duties and privacy practices, and to abide by the terms of this Notice.

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices, including data privacy and security process and standards of any third parties, including physicians and other health care providers using the Services, the manufacturer of your mobile device and other IT hardware and software, and any other third party mobile application, website, or service to which our Services may contain a link. These third parties may at times gather information from or about you. We have no control over the privacy practices of these third parties. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

Uses and Disclosures of PHI

We may use and disclose your PHI for the following purposes:

- **Treatment:** We may use and disclose your PHI to provide, coordinate, or manage your healthcare and related services. This may include communication with other healthcare providers about your treatment and coordinating your care with other providers.
- **Payment:** We may use and disclose your PHI to obtain payment for healthcare services provided to you. This may include contacting your insurance company to verify your coverage, billing, and collection activities, and sharing PHI with other healthcare providers, insurance companies, or collection agencies.
- **Healthcare Operations:** We may use and disclose your PHI for healthcare operations, including quality assessment, improvement activities, case management, accreditation, licensing, credentialing, and conducting or arranging for medical reviews, audits, or legal services.
- **As Required by Law:** We may use and disclose your PHI when required to do so by federal, state, or local law.
- **Public Health and Safety:** We may use and disclose your PHI to prevent or control disease, injury, or disability, to report child abuse or neglect, to report reactions to medications or problems with products, and to notify persons who may have been exposed to a communicable disease or may be at risk of spreading a disease or condition.
- **Health Oversight Activities:** We may disclose your PHI to health oversight agencies for activities authorized by law, such as audits, investigations, inspections, and licensure.
- **Judicial and Administrative Proceedings:** We may disclose your PHI in response to a court or administrative order, subpoena, discovery request, or other lawful process.
- **Law Enforcement:** We may disclose your PHI for law enforcement purposes, such as to report certain types of wounds or injuries, or to comply with a court order, warrant, or other legal process.
- **Research:** We may use and disclose your PHI for research purposes when the research has been approved by an institutional review board and privacy protections are in place.
- **Organ and Tissue Donation:** If you are an organ donor, we may disclose your PHI to organizations that handle organ procurement, transplantation, or donation.
- **Workers' Compensation:** We may disclose your PHI for workers' compensation or similar programs that provide benefits for work-related injuries or illnesses.
- **Military and Veterans:** If you are a member of the armed forces, we may disclose your PHI as required by military authorities.
- **Inmates:** If you are an inmate, we may disclose your PHI to the correctional institution or law enforcement official having custody of you.

Your Rights Regarding PHI

You have the following rights with respect to your PHI:

- **Right to Inspect and Copy:** You have the right to inspect and copy your PHI that we maintain, with certain exceptions. To request access, submit a written request to our Privacy Officer. We may charge a reasonable fee for the costs of copying, mailing, or other supplies associated with your request.
- **Right to Amend:** You have the right to request an amendment to your PHI if you believe it is incorrect or incomplete. To request an amendment, submit a written request to our Privacy Officer, specifying the information you believe is incorrect and why. We may deny your request if we believe the information is accurate and complete, or if we did not create the information.
- **Right to an Accounting of Disclosures:** You have the right to request an accounting of disclosures of your PHI made by us in the past six years, except for disclosures made for treatment, payment, or healthcare operations, and certain other disclosures. To request an accounting, submit a written request to our Privacy Officer.
- **Right to Request Restrictions:** You have the right to request a restriction on our use or disclosure of your PHI for treatment, payment, or healthcare operations. We are not required to agree to your request but will consider it. To request a restriction, submit a written request to our Privacy Officer, specifying the restriction you are requesting and to whom it applies.
- **Right to Request Confidential Communications:** You have the right to request that we communicate with you about your PHI in a certain way or at a certain location. To request confidential communications, submit a written request to our Privacy Officer, specifying how or where you wish to be contacted.
- **Right to a Paper Copy of This Notice:** You have the right to receive a paper copy of this Notice, even if you have agreed to receive it electronically. To obtain a paper copy of this Notice, contact our Privacy Officer.
- **Right to be Notified of a Breach:** You have the right to be notified in the event that we discover a breach of your PHI.

Transmission of PHI

We are committed to protecting the privacy of your PHI and will ensure that any electronic transmission of PHI subject to HIPAA complies with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule (45 CFR 164). This includes the use of Secure-Socket Layer (SSL) or equivalent technology for the transmission of PHI, as well as adherence to all applicable security standards for online transmissions of PHI.

Changes to This Notice

We reserve the right to change this Notice, and the revised Notice will be effective for PHI we already have about you, as well as any information we receive in the future. We will post a copy of the current Notice in our office and on our website. The Notice will contain the effective date on the first page.

Complaints

If you believe your privacy rights have been violated, you may file a complaint with our Privacy Officer or with the Secretary of the Department of Health and Human Services. You will not be retaliated against for filing a complaint.

Contact Information

To exercise any of your rights, or if you have any questions about this Notice or our privacy practices, please contact our Privacy Officer. This Notice is provided in accordance with the Notice of Privacy Practices for Protected Health Information from the Department of Health and Human Services' Model and is applicable across all US states.

Rights of Specific Jurisdictions within the US Certain states may have additional privacy protections that apply to your PHI. The following is an example of specific rights in the state of California. If you reside in a state with additional privacy protections, you may have additional rights related to your PHI.

California Residents:

- **Right to Access:** In addition to the rights described above, California residents have the right to request access to their PHI in a readily usable electronic format, as well as any additional information required by California law. To request access, submit a written request to our Privacy Officer.
- **Right to Restrict Certain Disclosures:** California residents have the right to request restrictions on certain disclosures of their PHI to health plans if they paid out-of-pocket for a specific healthcare item or service in full. To request such a restriction, submit a written request to our Privacy Officer.
- **Confidentiality of Medical Information Act (CMIA):** California residents are protected by the Confidentiality of Medical Information Act (CMIA), which provides additional privacy protections for medical information. We are required to comply with CMIA in addition to HIPAA.
- **Marketing and Sale of PHI:** California residents have the right to request that their PHI not be used for marketing purposes or sold to third parties without their authorization. To request a restriction on the use of your PHI for marketing or the sale of your PHI, submit a written request to our Privacy Officer.
- **Minor's Rights:** If you are a minor (under the age of 18), you have the right to request that certain information related to certain sensitive services, such as reproductive health, mental health, or substance use disorder treatment, not be disclosed to your parent or guardian without your consent. To request a restriction on the disclosure of such information, submit a written request to our Privacy Officer.

If you reside in a state other than California, please consult your state's specific privacy laws for information about any additional rights you may have regarding your PHI. You may also contact our Privacy Officer for more information about your rights under specific state laws.

California: For residents of California, we comply with the Confidentiality of Medical Information Act (CMIA), as well as California's specific privacy laws related to marketing, sale of PHI, and minors' rights. We will obtain written

consent before disclosing certain information and adhere to additional privacy protections, as required by California law.

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices, including data privacy and security process and standards of any third parties, including physicians and other health care providers using the Services, the manufacturer of your mobile device and other IT hardware and software, and any other third-party mobile application, website, or service to which our Services may contain a link. These third parties may at times gather information from or about you. We have no control over the privacy practices of these third parties. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

How We Protect Your Information

We take a variety of technical and organizational security measures designed to protect both your PHI and Personal Information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, or access. However, no method of transmission over the Internet, and no means of electronic or physical storage, is secure. As such, you acknowledge and accept that we cannot guarantee the security of your information transmitted to, through, or on our Services or via the Internet and that any such transmission is at your own risk. Where we have given you (or where you have chosen) a password that enables you to access the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. The information you share in public areas may be viewed by any user of the Services.

Privacy Information for California Residents

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use, and share your "personal information" (as defined in the California Consumer Privacy Act ("CCPA")).

Categories of personal information we collect and disclose. Throughout this Policy, we discuss in detail the specific pieces of personal information we collect from and about our users. Under the CCPA, we are also required to provide you with the "categories" of personal information we collect and the categories of third parties to which we disclose personal information. Please note that some of the information we collect through the Services (e.g., medical information), is subject to various health data privacy laws, and is therefore not subject to the CCPA. See the following chart to understand more about the categories of personal information we collect that are subject to the CCPA and the third parties to which we disclose it:

Category of Personal Information

- Identifiers and contact information (e.g., name, address, email address, account names, government-issued IDs and numbers)
- Commercial and transactional information (e.g., information about your purchases)
- Financial information (e.g., credit card info collected by our payment processors)
- Internet or other network or device activity (e.g., IP address, browsing history, app usage)
- Geolocation information (e.g., general location and precise location, with your permission)
- Demographic and statistical data (e.g., your gender, interests based on products and services you use)
- Physical characteristics (e.g., photos and videos of you)
- User-generated content (e.g., information you choose to post in our online forums)
- Customer service data (e.g., information you provide through a chat or call with us)

Your California Privacy Rights

CCPA Rights Disclosure. If you are a California resident, the CCPA allows you to make certain requests about your personal information. Specifically, the CCPA allows you to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.

The CCPA further provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights.

Please note that certain information may be exempt from such requests under California law. For example, we need certain information to provide the Services to you. We also will take reasonable steps to verify your identity before responding to a request.

If you are a California resident and you would like to exercise any of your data rights under California law, email us.

Please include your full name, email address and residential address associated with your use of our Services, along with the rights you would like to exercise, so that we can process your request in an efficient manner.

Sale of Personal Information. The CCPA requires companies that "sell" (as defined in the CCPA) your personal information to provide you with notice and an opportunity to opt out. Like many companies with an internet presence, we do work with third parties that provide marketing and advertising services to us, including interest-based advertising services, and these third parties may place tags, pixels, cookies, beacons, and other similar tracking mechanisms on our Website and App and collect your online identifiers. Because of the CCPA's broad definitions of "sale" and "personal information," making certain online identifiers available to these companies so that they can provide marketing and advertising services to may be considered a "sale" under the CCPA. To opt out of sharing your information with participating third parties for interest-based advertising, please visit the [Network Advertising Initiative's Consumer Opt-Out link](#), the [Digital Advertising Alliance's Consumer Opt-Out link](#), or [Your Online Choices](#). Please note that these opt-outs are device and browser based, so you will need to opt out on each of your devices and browsers. For more information, see the Online Analytics and Advertising Section above.

- As discussed above in the "Online Advertising" section, we may also share information such as your email address with third-party advertising networks that use such information to better target advertising to you regarding our products and services, as well as other products and services, as you browse the internet. This sharing may be considered a "sale" under the CCPA. To opt out, please email us.
- **Shine the Light Disclosure.** The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

Retention of Your Information

We keep your information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

Revisions to Our Privacy Policy

We reserve the right to change this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology.

We will make the revised Privacy Policy accessible through the Services, so you should review it periodically. The date this Privacy Policy was last revised is identified at the top of the document. You are responsible for periodically

monitoring and reviewing any updates to the Privacy Policy. If we make a material change to the Privacy Policy, we will provide you with appropriate notice in accordance with legal requirements. Your continued use of our websites after such amendments (and notice, where applicable) will be deemed your acknowledgment of these changes to this Privacy Policy.

State-Specific Provisions

In addition to the privacy practices described in our Notice of Privacy Practices for Protected Health Information, we comply with applicable state-specific privacy laws related to PHI.

Contacting Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us at:

GNO Holdings, Inc. dba Retra Health

EMAIL: support@RetraHealth.com

PHONE: 713-408-6380

ADDRESS: 800 Town and Country Blvd, Suite 500 Houston, TX 77024

MEDICAL ADVICE OR SERVICES

IF YOU ARE EXPERIENCING A MEDICAL EMERGENCY, YOU SHOULD DIAL "911" IMMEDIATELY. The content of this website is for informational purposes only and does not constitute professional medical advice, diagnosis, treatment, or recommendations of any kind. Further, the website is not intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease. You should always seek the advice of our board-certified medical practitioner or other qualified health care provider with any questions or concerns that you may have regarding your individual needs and any medical conditions. Visiting the website or registering an account does not create a physician-patient relationship. Reliance on the website without further consultation with a medical practitioner is solely at your own risk.