

# Combe Consumer Health Data Privacy Notice

Effective Date: February 1, 2025

This Combe Consumer Health Data Privacy Notice (“**Notice**”) supplements the [Combe Privacy Policy](#) and applies to Consumer Health Data (as defined below) subject to the Washington State My Health My Data Act, Nevada’s Consumer Health Data Privacy Law (SB 370), and similar state laws (collectively, “**Consumer Health Data Laws**”).

## **Our Collection and Use of Consumer Health Data**

The term “**Consumer Health Data**” as used in this Notice means any personal information that is linked or reasonably linkable to you and that identifies your past, present, or future physical or mental health status as defined in the Consumer Health Data Laws. The data we collect depends on the context of your interactions with us and, in most cases, is information that you decide to share with us through surveys, questionnaires, and for customer service purposes. Consumer Health Data does not include information that is considered deidentified under the Consumer Health Data Laws. Examples of Consumer Health Data that Combe may collect include:

- health-related conditions, symptoms, experiences, diagnoses, testing, medications, or treatments;
- social, psychological, behavioral, and medical interventions;
- health-related surgeries or procedures;
- use or purchase of prescribed medication;
- bodily functions, vital signs, symptoms, or measurements;
- gender-affirming care information;
- reproductive or sexual health information;
- data that identifies a consumer seeking health care services; or
- other information that may be used to infer or derive data related to the above or other health information.

We may process and/or use this information collected online and offline (including with your consent where required by Consumer Health Data Laws) for the following purposes:

- in the provision of services, providing you our websites, and related services;
- to communicate with you, including to respond to your questions and comments or to notify you of changes to our services;
- to identify and authenticate you;
- to help ensure security and integrity of our systems to the extent the use of Consumer Health Data is reasonably necessary and proportionate for these purposes;
- administrative purposes including providing customer service (including online service) or verifying customer information;
- undertaking internal research for product development, quality, or safety;
- to protect against malicious, fraudulent, or illegal activity;
- complying with legal and regulatory obligations;
- auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- for marketing and advertising, including using your information to send you messages, notices, newsletters, surveys, promotions, or event invitations about our own goods and services that may be of interest to you. You can also unsubscribe from any marketing communications that we may

send you by following the instructions included in our correspondence or emailing us using the contact details provided at the end of this Notice;

- for short-term, transient use including, but not limited to, non-personalized advertising shown as part of your current interaction with us; or
- other purposes we may notify you about or for which you provide your consent or authorization.

### **Sources From Which Your Consumer Health Data Is Collected**

The Consumer Health Data we collect may come from various sources, including:

- you and those authorized to provide Consumer Health Data on your behalf; or
- your personal devices.

### **Our Disclosure of Consumer Health Data**

We may share the categories of Consumer Health Data set forth above as follows:

- **Combe and Our Affiliates**: We may share your Consumer Health Data internally or with our affiliates as needed for the purposes listed above.
- **Service Providers**: We work with a variety of service providers who help us process your Consumer Health Data, such as to facilitate the provision of our services or that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, payment processing services, legal, and administrative services.
- **Parties with Whom You Have a Direct Relationship**: We may share with parties with whom you have a direct relationship for the purpose of providing services you request in circumstances where Combe maintains control and ownership of the data and the recipient uses the Consumer Health Data only at Combe's direction for the purpose for which the Consumer Health Data was collected or consented to.
- **Business Transactions**: We may take part in or be involved with a business transaction, such as a merger. We may share Consumer Health Data with a third party during the negotiation of or in connection with such a transaction to the extent permitted by applicable law.
- **Legal Obligations and Rights**: We may share Consumer Health Data with third parties: in connection with the establishment, exercise, or defense of legal claims; to comply with laws or to respond to lawful requests and legal processes; to submit reports to regulatory agencies; to protect our rights and property and the rights and property of others, including to enforce our agreements and policies; to detect, suppress, or prevent fraud; to protect the health and safety of us and others; or as otherwise required by applicable law.
- **With Your Consent**: We may share Consumer Health Data about you to certain other service providers or publicly with your consent or at your direction.

In the event we process deidentified data, we will maintain and use deidentified data without attempting to reidentify you except as permitted by law and will contractually obligate any recipients of such data to satisfy these criteria.

### **Exercising Your Privacy Rights**

Some Consumer Health Data Laws provide certain rights with respect to Consumer Health Data, including rights to access, delete, or withdraw consent relating to such data, subject to certain exceptions.

To exercise any of your privacy rights, or if you have any questions about your privacy rights, please do not hesitate to contact us at:

E-mail : [privacy@combe.com](mailto:privacy@combe.com).

Phone : 1 800-431-2610

If we decline or are unable to take action regarding your request, we will notify you with our reasons and will provide instructions for how you can appeal the decision. If the appeal is unsuccessful, you may raise a concern or lodge a complaint with the applicable attorney general or other regulatory authority in your state.

With respect to cookies and tracking technologies, you can manage your preferences via our cookie banner on our website.

### **Changes to this Consumer Health Data Privacy Notice**

From time-to-time, we may change this Notice. We will post any changes on this page. If we change the Notice significantly, we will notify you by adding a prominent notice on our websites and services; by sending you an email notification; or via other appropriate communication channels, as required by applicable law. To the maximum extent permitted by applicable law, any changes will become effective when we post the updated Notice, and your use of our services following these changes means that you accept the updated Notice. We encourage you to review this Notice when you use our services to stay aware of our information practices.