

# Keiko Wellness Privacy Policy

Last Updated: June 16, 2025

## Introduction

Keiko Wellness (referred to as "we", "us", or "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, and protect your personal information when you use our website or any of our services. It applies to all visitors, customers, and users of our site (the "Site") globally.

By using our Site or services, you agree to the collection and use of your information as described in this policy. We only collect personal information that is necessary to provide and improve our services, and we handle it in accordance with this policy and applicable data protection laws.

*Note:* This policy covers information collected through our website and related online services. It does not cover information that might be collected through other means (such as at in-person events, phone calls, or social media) unless specifically stated.

## What is Personal Information?

"Personal information" means any information that can identify you or that relates to an identifiable individual. This includes obvious things like your name, mailing address, email address, and phone number, as well as other information such as:

- **Account and Contact Details:** Name, email address, postal address, phone number, login credentials (if you register an account).
- **Demographics:** Your gender or age (if you choose to provide them).
- **Payment Information:** Credit card details or other financial information (when making a purchase).
- **Identifiers and Online Information:** IP address, geographic location, and browsing behavior on our Site.
- **Health and Wellness Information:** Information about your health, lifestyle, or nutrition that you share with us in forms or consultations.

- **Purchase and Activity History:** Records of your orders, services you've used, and your interactions with our Site.

Personal information also includes any other data you choose to provide to us that can identify you, either on its own or when combined with other data.

## How Do We Collect Your Information?

We collect personal information from you in several ways, including:

- **When You Provide It Directly:** For example, when you:
  - Register for an account or fill out forms on our Site.
  - Place an order for our products or services (for example, when you buy a product or program from us; if you purchase something as a gift for someone else, we will collect the information needed to deliver that gift to the intended recipient).
  - Schedule a consultation or fill out an intake questionnaire for our holistic nutrition services.
  - Sign up for our newsletter, download a free e-book, or enter a contest/promotion.
  - Contact us via email, contact form, social media message, or other communication channels.
  - Participate in a survey, provide feedback, or respond to a communication from us.
- **Through Automatic Means:** When you use or browse our Site, we use cookies and similar tracking technologies to collect technical information about your device and usage of our Site. This may include your IP address, browser type, operating system, referral URLs, pages you viewed, how long you spent on pages, and actions you take (such as links clicked). (See the **Cookies and Tracking** section below for more details.)
- **From Third Parties:** We may receive information about you from third-party services that you use in connection with our services. For example, if you schedule an appointment through our scheduling partner or make a payment through our payment processor, those platforms may send us information like your name, contact info, and appointment or transaction details.

You can always choose not to provide personal information, but keep in mind some information may be necessary to use certain features of our Site or to receive our services (for example, we need contact and payment information to process an order).

## Categories of Personal Data We Process and Why

We organize the personal information we collect into a few general categories, based on how and why we use it. Below is an overview of these categories, with examples of the data and our purpose for processing it:

- **Communication Data:** Includes any communications that you send to us, whether by email, through a contact form, by text message, via social media, or any other medium. **Purpose:** We process this data to respond to you, to keep records of our communications, and to train our team (for example, by reviewing communications to improve our responses). This also helps us resolve any issues and, if necessary, establish or defend legal claims. **Legal Basis:** Our legitimate interests in providing you with good customer service and protecting our business interests (e.g., being able to prove what was communicated in case of a dispute).
- **Customer Data:** Includes information related to purchases of our goods or services. This may include your name, title, billing address, delivery address, email, phone number, contact details, purchase details (like which product or service you bought), and payment information (such as card details). **Purpose:** We use this data to fulfill orders and provide services you have purchased, to manage transactions (e.g., process payments, send receipts), and to maintain proper records of those transactions. **Legal Basis:** To perform a contract with you (i.e., to deliver the product or service you paid for) and our legitimate interest in maintaining transaction records for our business (as well as to comply with legal obligations like financial reporting and tax requirements).
- **User Data:** Includes data about how you use our website and services, together with any content you post on our website or through our online services. For example, this covers things like comments you leave on our blog, information you submit through a client portal, or preferences you set on your account. **Purpose:** We process this data to operate and improve our website and online services, ensure relevant content is provided to you, maintain the security of our Site (such as preventing fraud or abuse), and administer our website and business (like troubleshooting issues and backing up our database). **Legal Basis:** Our legitimate interests in running our website efficiently, providing appropriate content, and protecting our business.
- **Technical Data:** Includes information collected automatically about your visit to our Site. This might include your IP address, login data (for instance, when you last logged in), browser type and version, time zone setting and approximate location, browser plug-in types, pages you visit, how long you spend on those pages, navigation paths between pages, how often you visit the Site, and other technology on the devices you use to

access our Site. Typically, this data comes from analytics tracking systems (like Google Analytics) or cookies on our Site. **Purpose:** We process this data to analyze how our visitors use the Site, to troubleshoot performance issues, to maintain security, and to inform our decisions about improving the Site and our services. It also helps us plan our business strategies (for example, understanding which pages or services are most popular or where users might be encountering errors). **Legal Basis:** Our legitimate interests in understanding and improving how people use our Site, keeping our Site secure, and enhancing the user experience.

- **Marketing Data:** Includes information about your preferences in receiving marketing from us (such as whether you subscribed to our newsletter or opted into certain promotions) and details about your engagement with our marketing communications. For instance, it may include whether you opened a newsletter email and which links you clicked, or your responses to marketing surveys. **Purpose:** We use this data to manage and send you promotions and marketing content that you have agreed to receive (such as special offers, affiliate offers, or free giveaway contests), to deliver relevant website content and advertisements to you, and to measure the effectiveness of our marketing campaigns. **Legal Basis:** Our legitimate interests in studying how customers use our products/services, in developing them, in growing our business, and in informing our marketing strategy. In some cases, where we are required by law to obtain your consent for marketing (for example, for certain email communications), we will rely on your consent. In other cases, if you are an existing customer, we may send you marketing based on our legitimate interest (as permitted by law), but you will always have the option to opt out.

We may sometimes use the data in these categories together to get a more complete view of how you use our services. For example, we might combine Customer Data and User Data to personalize recommendations for you, or combine Technical Data and Marketing Data to improve our advertising strategies. We always do so under the same conditions and legal bases outlined above.

## **Sensitive Personal Information (Health Data)**

Sensitive personal information includes things like details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, genetics, biometrics, health, sexual orientation, and any information about criminal convictions. Except for the health and wellness information you choose to provide us, we **do not** intentionally collect other types of sensitive personal data.

Because our services involve holistic nutrition and wellness, we **may collect information about your health** and lifestyle in order to provide you with personalized guidance. For example, during an intake process or a consultation, we might ask about your medical history, symptoms,

dietary habits, or other health-related information that is relevant to your wellness goals. This kind of information is considered **sensitive personal information** under many privacy laws.

**How We Handle Health Information:** We will only collect and use your health information with your explicit consent and only for the purposes of providing our services to you. Any health or sensitive information you provide is treated with the highest care:

- We only ask for information that is reasonably necessary for your nutrition and wellness plan.
- We store this information securely (for instance, within our protected client management system) and limit access to it strictly to those on our team who need to know it in order to serve you.
- We will never share your health information with any third party without your explicit consent, **except** if required by law or in an emergency situation (for example, if disclosure is necessary to protect your vital interests or those of another person, such as to prevent serious harm).

Aside from health data, we do not collect sensitive personal information like your racial or ethnic origin, political opinions, religious beliefs, or information about any criminal convictions or offenses. If we ever need to handle other types of sensitive data for a specific reason, we will do so in compliance with applicable laws and with your knowledge and consent.

## How Do We Use Your Information?

We use the personal information we collect from you for various purposes, all aimed at operating our business and serving you better. Specifically, we may use your information in the following ways:

- **To Provide and Personalize Our Services:** We use your information to deliver the products and services you request. For example, if you purchase a product or sign up for a consultation, we will use your details to fulfill that order or schedule that service. We might also use information like your browsing behavior or feedback to personalize your experience on our Site, showing you content or product offerings that match your interests.
- **To Communicate with You:** Your contact information (such as your email address or phone number) is used to send you confirmations, updates, and any information related to your orders or services. We may also reach out to you to respond to your inquiries or send important notices. If you contact us with a question or problem, we will use the information you provided to help resolve your issue.

- **For Customer Service and Support:** Information you provide helps us address your customer service requests and support needs more effectively. Knowing your history with us (for example, your past purchases or any previous communications) allows us to provide more tailored and efficient support.
- **To Process Transactions:** We use the personal information you give us when placing an order (such as your name, shipping address, and payment details) to process your transactions and deliver the product or service you purchased. This includes sending you order confirmations, receipts, shipping updates, or any necessary electronic invoices. We may also use this information to verify your identity, process refunds or exchanges, and protect against fraudulent transactions.
- **To Administer Promotions, Surveys, or Other Features:** If you enter a contest, join a promotion, or respond to a survey/quiz on our Site, we will use the information you provided to conduct those activities. For example, if you enter a giveaway, we may use your contact information to notify you if you win. If you complete a survey, we will use your responses to improve our products or services. Any information collected for these purposes will be used in accordance with the rules of the promotion and this privacy policy.
- **To Send Periodic Emails and Marketing:** If you have opted in to receive our email newsletter or other marketing communications (such as free wellness tips, challenges, or an e-book offer), we will use your email address to send you informational and promotional emails. These emails might include company news, updates, relevant blog posts, product or service information, or special offers. We always include an unsubscribe link in these emails so you can opt out at any time if you no longer wish to receive them. (See **Marketing Communications & Your Choices** below for more on how to manage or stop marketing messages.)
- **To Improve Our Website and Services:** We use data about how users navigate and use our Site (gathered via cookies, analytics tools, and user feedback) to improve our website design, content, and overall user experience. For example, understanding which pages are visited most or how users move through our Site helps us identify what is working well and what might need improvement. This usage data helps us make informed decisions on adding new features, content, or services that better serve our community.
- **To Deliver Relevant Advertising:** We may use information about you (like how you use our Site or certain Marketing Data) to show you content and advertisements that are more likely to be of interest to you. This might include showing you targeted ads on our Site or on other platforms (for example, displaying our ads on social media sites like Facebook or on search engines like Google based on your interactions with our Site). We also analyze the performance of these ads (for instance, whether you clicked on an

ad) to understand and improve our marketing efforts.

- **To Maintain Security and Prevent Fraud:** We may use personal data (especially Technical Data and User Data) to keep our Site and services safe, secure, and trustworthy. This includes monitoring and analyzing activities on the Site to detect and prevent fraudulent transactions, spam, unauthorized access, or other harmful activities. It also involves enforcing our Site policies and terms of service to ensure that all users are using our Site in a manner consistent with those terms.
- **To Comply with Legal Obligations:** In some cases, we may need to use your information to comply with legal or regulatory requirements. For example, we may retain transaction records to meet tax and accounting laws, use your data to fulfill reporting obligations, or disclose information in response to lawful requests by public authorities (such as for law enforcement purposes).

We will not use your personal information for purposes that are not compatible with those described above without first obtaining your consent, unless such use is otherwise required or permitted by law.

## Marketing Communications & Your Choices

We want to communicate with you in a way that respects your choices and privacy. This section explains how we handle marketing communications and the options you have regarding the messages you receive from us.

**When We Send Marketing Messages:** If you sign up for our newsletter, download a free resource from us, or otherwise explicitly consent to receive marketing, we will send you emails with wellness tips, valuable content, updates, special offers, and other promotional information about our products and services. Additionally, if you become our customer (for example, by purchasing a service or joining a program), we may send you information about similar products or services that we believe could be of interest to you. In all cases, we will respect applicable laws regarding marketing communications and your rights.

**Opting In and Out:** We will either ask for your clear consent before sending you marketing emails, or we will send them based on an existing customer relationship, depending on what is allowed under applicable law and how you have interacted with us:

- If you are **not yet a customer** (for instance, you have not made a purchase or signed up for a paid service), we will only send you marketing emails if you have actively opted in to receive them. This might happen by you entering your email on our website to subscribe to a newsletter, requesting a free e-book, or checking a box to receive updates.

- If you are an **existing customer** who has purchased something from us or inquired about our services, we may send you marketing messages about our products or services that are similar to what you received or asked about. We do this under the principle of "legitimate interest" to keep you informed of relevant offerings. **However, you always have the right to opt out of these messages at any time.**

**How to Unsubscribe:** If you no longer want to receive marketing emails from us, it's easy to stop them. Every marketing email we send includes an "**Unsubscribe**" link at the bottom. By clicking that link, you can automatically remove yourself from our mailing list. Alternatively, you can contact us at [support@keikowellness.com](mailto:support@keikowellness.com) and request to be taken off our email list. We will process your request as soon as possible. Please note that you might still receive a few messages that were already in the process of being sent when you opted out, but we will strive to halt any further marketing communications promptly.

**Transactional and Service Emails:** Opting out of marketing emails will not stop all communications from us. We may still need to email or contact you for non-marketing reasons. For example, we will continue to send you:

- **Service and Transactional Communications:** These include emails or messages about your orders, purchases, or services you are using. Examples are payment receipts, appointment reminders, account updates, or important information about a product you've bought (like changes to a program schedule or a recall notice).
- **Administrative or Legal Notices:** We might send communications regarding changes to our terms of service, privacy policy updates, or other critical notices about your rights and our obligations.

These types of communications are necessary for us to provide services to you and for customer care, so you'll receive these even if you've unsubscribed from marketing messages (unless you cease to use our services entirely).

**No Third-Party Marketing Without Consent:** We do not share your personal information with unrelated third parties for their own marketing purposes unless we have your explicit consent to do so. This means you won't suddenly start receiving marketing emails from other companies because you provided your information to us. If we ever contemplate a partnership that involves sharing your information for marketing, we will notify you and, if required, obtain your consent before doing so.

## Cookies and Tracking Technologies

Like many websites, we use **cookies** and similar tracking tools to enhance your experience and gather information about visitors and visits to our Site. Cookies are small text files that a website

(or its service provider) places on your computer or device through your web browser. They serve a variety of functions, such as remembering your preferences or recognizing you when you return to the site. Here's how we use cookies and your related options:

### How We Use Cookies:

- **Necessary Cookies (Site Functionality):** Some cookies are essential for our website to function properly. For instance, they may be used to keep you logged in when that feature is available, or to remember items you add to your shopping cart. Without these cookies, certain services you have asked for (like e-commerce cart functionality) cannot be provided.
- **Preference and Personalization Cookies:** These cookies remember choices you make (such as your language or region, or other preferences) to provide a more personalized experience. They can make your browsing experience smoother by remembering your settings.
- **Analytics Cookies:** We use analytics tools (like Google Analytics) that set cookies to collect information about how visitors use our Site. Through these cookies, we gather data on things like which pages are visited, how long people stay on each page, how users came to our Site, and if any errors occurred. This information is aggregated and anonymized — it does not directly identify you. We use it to identify trends, track the performance of our site, and make improvements. For example, an analytics cookie helps us see if a lot of users are dropping off on a certain page, indicating we might need to fix something on that page.
- **Advertising Cookies:** We partner with third-party advertising networks (such as Google and Facebook) that use cookies and similar technologies to collect information about your browsing activities over time and across different websites. These cookies remember that you visited our Site and what your interests might be. The information collected is used to show you **personalized advertisements** that are more likely to be relevant to you. For example, if you looked at a certain service on our Site, you might later see an ad for that service on Facebook. These cookies also help limit the number of times you see an ad and measure the effectiveness of our advertising campaigns (for instance, whether you clicked on an ad).

### Your Choices for Cookies:

Most web browsers automatically accept cookies, but you have the option to change this behavior. You can typically modify your browser settings to notify you when a cookie is being placed on your computer, or to block cookies altogether. Here are some ways you can manage cookies:

- **Browser Settings:** Check your web browser's settings (usually under "Options" or "Preferences") for controls related to cookies. Depending on the browser, you may be

able to clear existing cookies, block cookies (all or only from specific sites), or set up alerts for when cookies are being sent. Please note that if you disable all cookies, some features of our Site may not function as intended. For example, you might not be able to use certain parts of the Site that require login or cart functionality, and your preferences might not be saved for your next visit.

- **Opt-Out Tools for Advertising Cookies:** If you are concerned about third-party advertising cookies, there are industry opt-out sites you can use. The **Network Advertising Initiative (NAI)** and the **Digital Advertising Alliance (DAA)** provide tools to opt out of many advertising cookies. You can visit the [NAI's opt-out page](#) or the [DAA's opt-out page](#) to opt out of interest-based advertising from participating companies. Keep in mind that opting out through these mechanisms does not mean you will stop seeing ads; it just means the ads you see may be less relevant to your interests.

**Do Not Track Signals:** Some web browsers have a "Do Not Track" (DNT) feature that, when turned on, sends a signal to websites indicating that you do not want to be tracked. Currently, there is no uniform standard adopted by industry groups, technology companies, or regulators to govern how websites should respond to DNT signals. As a result, our Site does **not respond** differently to a browser's DNT signal. We continue to review new technologies and may adopt a DNT standard if one is established in the future. In the meantime, you can use the cookie management methods described above to control online tracking.

By using our Site with your browser settings adjusted to accept cookies, you consent to our use of cookies and similar technologies as described in this section. If you do not consent, you can adjust your browser settings as described, but please be aware that doing so may affect your experience of our Site.

## Disclosure of Your Personal Data

We do **not** sell or rent your personal information to outside parties for their own marketing purposes. We understand the importance of keeping your information confidential. However, we do share certain personal data with trusted third parties who help us operate our business and provide services to you. We only share what is necessary for these third parties to perform their functions, and they are required to keep your information secure and use it only for the purposes we specify.

### Categories of Third Parties Who May Receive Data:

- **Service Providers and Partners:** We share information with third-party companies that help us deliver our services and run our operations. This includes:
  - **IT and Hosting Providers:** Companies that provide the infrastructure for our website and data (for example, web hosting services or cloud storage providers).

They ensure our Site is available and running smoothly.

- **Website and App Functionality Services:** Tools that add features to our business. For example, we use a **scheduling service** to allow you to book appointments, and a **client management platform** to conduct consultations and manage your health records. These services collect information (like your name, contact info, appointment details, or health information) to perform their role in our service delivery.
- **Payment Processors:** When you make a purchase on our Site, your payment is processed by a third-party payment processor. We use **Stripe** for secure payment processing. This means that when you enter your credit card or payment details, that information is securely transmitted directly to Stripe. Stripe uses your payment information to process the transaction. We do **not** store your full credit card details on our servers. (We may keep a record that a transaction took place, but sensitive payment data is handled by Stripe.)
- **Client Management and Scheduling Tools:** We rely on specialized third-party platforms to manage client bookings, records, and communications. For example, we use **Calendly** to schedule appointments with clients, which means Calendly will collect your name, email, and selected time slot to arrange the meeting. We also use **Practice Better** as our practice management tool, which helps us store and organize your health information, intake forms, and consultation notes. If you interact with us through the Practice Better platform (including its mobile app for 1-on-1 consultations), your personal and health data are processed and stored on that platform. Practice Better is contractually obligated to protect your information and only use it according to our instructions (for instance, to facilitate our consultations with you).
- **Marketing and Email Services:** We use certain platforms to send out newsletters, announcements, and to host online content. For instance, we may use **Systeme.io** to manage our email list, send newsletters, or provide access to digital resources or courses. These platforms will handle your name and email (and possibly other info like whether you opened an email) on our behalf. They are not allowed to use your data for their own purposes.
- **Analytics and Advertising Partners:** As mentioned in the Cookies section, we work with partners like Google Analytics or Facebook (Meta) for analytics and advertising. In some cases, we might share bits of information with these partners or allow them to collect information through our Site (via cookies or pixels). For example, we might share a hashed (encrypted) version of your email with a platform to help identify you as part of an audience for advertising (this is a common practice for custom audience targeting). These partners analyze data about our website or help us show ads, but they are not allowed to use personal

data from our site for their own unrelated purposes.

- **Professional Advisors:** We may share relevant portions of your information with our professional advisors such as our attorneys, accountants, auditors, or insurance companies. This would only happen as needed for advising us or completing professional obligations. For example, our accountant might see your purchase history when preparing financial statements, or our lawyer might need details about a transaction if a legal issue arises. These professionals are bound by confidentiality rules and legal duties to protect your information.
- **Government Authorities or Law Enforcement:** We may disclose personal information when we are legally required to do so. This means that if a government authority, court, or law enforcement agency lawfully compels us to release information (through a subpoena, court order, or similar legal process), we will comply after verifying the request. We may also share information if we believe in good faith that it's necessary to: comply with the law or legal process; enforce our site policies or agreements; protect our rights and property; or ensure the safety of our users or others. For instance, if required, we might provide information to law enforcement to investigate illegal activities such as fraud or threats.
- **Business Transfers:** If in the future our company or business assets are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, your personal data could be transferred as part of that transaction. For example, if another company acquires us, your information would likely be one of the assets transferred to that company so they can continue to provide services to you. Should such a transfer occur, we will ensure that your personal data remains subject to confidentiality commitments, and we will notify you of any changes to how your personal information is handled.

We require all third parties who handle your personal data on our behalf to respect the security of your information and to treat it in accordance with the law. We only permit them to process your data for specified purposes and in accordance with our instructions. They are not permitted to use your data for their own purposes.

Additionally, we may share **aggregated or anonymized information** (information that cannot identify you personally) with third parties. For example, we might compile statistical data about how many users visited our Site in a given month or what the most popular services are, and share that with a research partner or publish it in marketing materials. This aggregated data will not contain anything that could be used to identify you or any other individual.

## **Data Security: How We Protect Your Information**

We take the security of your personal information very seriously. We implement a variety of security measures to safeguard your data from loss, misuse, unauthorized access, alteration, or disclosure. While no method of data transmission or storage is 100% secure, we strive to use industry best practices to protect your personal data.

- **Secure Systems and Encryption:** Our website and databases are secured using modern security standards. Whenever you provide sensitive information (such as credit card details) through our Site, that information is encrypted during transmission using Secure Socket Layer (**SSL**) or a similar encryption technology. Encryption is a way of scrambling data so that only authorized parties (in our case, our payment processor) can read it. For example, when you enter payment information, the SSL technology ensures that this data is encrypted before it's sent over the internet. The data is then decrypted only by the intended recipient (e.g., the payment processor). We do not store your credit card number or sensitive payment data on our own servers; such information is handled by our secure payment partner (like Stripe).
- **Restricted Access:** Your personal information is stored on secure systems and is accessible only by a limited number of people who have special access rights. These individuals are typically our employees or contractors who need the information to perform specific jobs (for example, customer service, order fulfillment, or technical operations). They are trained on the importance of confidentiality and are required to keep your information confidential. We use access controls to ensure that each person only accesses the data necessary for their role.
- **Physical and Administrative Security:** In addition to technical safeguards, we also maintain physical and administrative safeguards. Any printed copies of documents containing personal data (if ever used) are kept in a secure environment (such as a locked cabinet in a controlled office). We regularly review who has access to our systems and data, and update permissions when people's roles change or if they leave our team. We also have policies and training in place to ensure that personal data is handled properly and that our team members are aware of their responsibilities in protecting your data.
- **Third-Party Security:** When we use third-party services (like the ones mentioned in the disclosure section) to store or process your data, we choose reputable providers that use robust security measures. We also have agreements in place with these providers to ensure they provide an appropriate level of security for your information.
- **Ongoing Updates and Monitoring:** We keep our software, website platform, and security protocols up to date to protect against known vulnerabilities. We also monitor our systems for possible attacks or intrusions and have measures in place to detect and respond to unusual activity.

**Handling of Potential Breaches:** Despite all these precautions, no system is completely immune to breaches. We have a data breach response plan in place. If we suspect or become aware that personal data has been compromised, we will act quickly to identify the issue, mitigate any harm, and prevent further unauthorized access. In the unfortunate event of a data breach that poses a risk to your rights and freedoms, we will notify you as soon as possible (and within any timeframes required by law). We will also report the incident to the appropriate data protection authorities if required. Our notification to you will include, to the extent we know, details of what happened and what data might be affected, what steps we are taking, and any steps we recommend you take (for example, changing passwords or being vigilant for phishing attempts).

It's also important for you to play a role in keeping your data safe. Remember to use a strong, unique password for any account you create on our Site and be cautious about sharing your account details with others. If you ever suspect that your interaction with us is no longer secure (for example, if you feel that your account might have been compromised), please contact us immediately.

## Data Retention: How Long Do We Keep Your Information?

We will keep your personal information only for as long as it is necessary to fulfill the purposes for which we collected it, including for satisfying any legal, accounting, or reporting requirements. In other words, we don't keep your data forever — we retain it for the minimum period needed, then we securely dispose of it.

To determine the appropriate retention period for personal data, we consider several factors:

- **The Amount, Nature, and Sensitivity of the Data:** We evaluate the type of data we hold. For instance, contact information may be kept longer for customer relationship purposes, whereas highly sensitive data (like health information) will be kept no longer than necessary for the service provided. Sensitive data is handled with extra care and not retained indefinitely without a good reason.
- **The Potential Risk of Harm from Unauthorized Use or Disclosure:** We consider the potential impact on you if the data were kept for a longer period than needed. If data is older and no longer needed, holding onto it could create unnecessary risks (for example, older data might become outdated or potentially vulnerable). We aim to minimize these risks by not keeping data longer than we need to.
- **The Purposes for which We Process the Data:** We look at why we collected the data in the first place and whether that purpose is still relevant. If we collected information to provide you with a service, once that service has been fully delivered and we have no further legal obligations related to that data, we will consider deleting it. In some cases, we might have collected data with your consent for a specific purpose (like a research project or a limited-time promotion); in those cases, we'll delete the data after the

purpose is completed and any legally required retention period is over.

- **Legal, Accounting, or Reporting Requirements:** Various laws require us to keep certain records for a minimum period. For example:
  - **Tax and Transaction Records:** In many jurisdictions, businesses must keep records of sales and transactions for a number of years for tax compliance. In Canada and the U.S., for instance, it's common to retain such records for about 7 years. This means that even if you delete your account or cease being a customer, we might retain basic information about transactions you made (like invoices, amounts, and dates) for up to seven years to comply with tax and accounting laws.
  - **Legal Compliance and Dispute Resolution:** If we are handling a legal dispute or are required by law to keep certain data (like in the case of an investigation), we will retain the data as long as it is necessary to resolve the issue or comply with the law, even if this extends beyond our typical retention period.

#### **Typical Retention Periods:**

- For most customer information (like your contact details, account information, and communications with us), we will retain it for as long as you remain a customer, and then for a certain period after your last interaction or transaction. This post-relationship retention allows us to maintain records in case you return as a customer, address any issues that arise after the relationship ends, or comply with any legal obligations. A common timeframe for retaining basic records after you stop using our services is around seven (7) years, aligning with the tax record-keeping requirements mentioned above.
- For marketing data (such as your email address for newsletters), we retain it until you unsubscribe or ask us to delete it. If you unsubscribe from marketing, we may keep your email on a "do not contact" list to ensure we respect your opt-out.
- For health and consultation records, we will keep them for as long as necessary to provide services to you and for a period afterward as needed for any follow-up care or as required by any professional guidelines we follow. We understand that health-related information can be sensitive, so we will not retain it longer than needed. If you cease to be a client and request deletion of your health records, we will delete them unless we have a compelling reason or legal obligation to keep them (for example, some health practitioners are required to keep records for a certain number of years by law or professional policy — if that applies, we will inform you).

When we no longer have a legitimate need to keep your personal data, we will securely delete it or anonymize it. *Secure deletion* means we use methods to wipe the data from our systems so that it cannot be recovered. If physical documents exist, they will be shredded or incinerated. If we have archived or backup copies of data, those will be put beyond use or deleted as well once the retention period expires.

In some cases, instead of outright deletion, we may anonymize your personal data so that it can no longer be associated with you. For example, we might take usage data and remove any personal identifiers, turning it into statistical information. We may use this anonymized data indefinitely without further notice, since it contains no personal information.

## Your Rights and Choices Regarding Your Information

You have certain rights regarding your personal information, and we want to help you understand and exercise those rights. The availability of these rights can depend on your jurisdiction (different countries or regions have different data protection laws), but we extend as many rights as possible to all our users. Below, we outline key rights you have concerning your data:

- **Right to Access Your Information:** You have the right to request a copy of the personal information we hold about you. This is sometimes called a *Subject Access Request*. Upon request, we will provide you with a summary of the data we have about you, typically within a reasonable time frame. You can ask for this to understand what information we have collected, to verify that we're using it lawfully, and to confirm its accuracy.
- **Right to Correct Your Information:** If you believe that any personal data we have is incorrect or incomplete, you have the right to request that we correct or update it. For example, if you change your email address or phone number, or if we recorded something inaccurately, let us know and we will fix it. We strive to keep your information accurate and up to date, and we appreciate your help with this.
- **Right to Delete Your Information:** You have the right to request that we delete (erase) your personal data. This is sometimes referred to as the *"right to be forgotten."* If you ask us to delete your data, we will remove or anonymize the personal information we hold about you, provided that there is no lawful reason for us to keep it. For instance, we might not be able to delete data that is required to fulfill our legal obligations (like records of a transaction for tax purposes) or data that is needed to establish or defend legal claims. We will inform you if that's the case.
- **Right to Withdraw Consent:** In situations where we rely on your consent to process your personal data (for example, if you gave us consent to use your testimonials or to send you certain marketing materials), you have the right to withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of any processing we did based

on your consent before you withdrew it. For example, if you consented to receive our newsletter and then withdraw that consent, we will stop sending you the newsletter, but any past processing of your email for sending previous newsletters was lawful.

- **Right to Object or Restrict Processing:** You may have the right to object to our processing of your personal information or ask us to restrict it.
  - **Object:** You can object to our processing if you feel it impacts your rights or freedoms in a way that you think is unfair. For example, you have an absolute right to object to direct marketing — if you object, we will stop processing your data for marketing purposes. You can also object if our processing is based on our legitimate interests and you have a particular reason to want to stop it due to your personal circumstances. We will comply with your objection unless we have compelling legitimate grounds to continue (such as a legal requirement).
  - **Restrict:** You can ask us to limit how we use your data in certain circumstances. This might apply if you have challenged the accuracy of your data (you can request we restrict use until we verify accuracy), or if you have objected to our use of your data (you can request we restrict processing until we determine whether our legitimate grounds override yours), or if our processing is unlawful but you prefer restriction over deletion, or if we no longer need the data but you need us to keep it for a legal claim. When processing is restricted, we will still store your data, but not use it further until the issue is resolved.
- **Right to Data Portability:** You have the right, in certain cases, to receive your personal data in a structured, commonly used, machine-readable format and to have that data transmitted to another party. This right typically applies when you have provided data to us and we are processing it by automated means based on your consent or on a contract you have with us. For example, if in the future you want to switch to a different service provider and you want your data moved, this right would facilitate that transfer.

**How to Exercise Your Rights:** If you want to exercise any of the rights described above, you can contact us by email at [support@keikowellness.com](mailto:support@keikowellness.com). Please clearly state what right you wish to exercise and provide us with enough information to verify your identity. For example, we may ask for your name, email, or other details we have on file to ensure that we are dealing with the correct individual. This verification step is to protect your privacy — we wouldn't want to disclose or delete someone else's data in response to your request.

We will respond to your request as soon as we can, generally within 30 days. If your request is complex or if we have received many requests, it might take us longer (in which case, we will inform you of the need for an extension). Normally, you will not have to pay a fee to exercise these rights. However, if a request is unfounded or excessive (for instance, repetitive requests beyond what is reasonable), we may charge a reasonable fee or refuse to act on it, as permitted by law. If we refuse a request, we will provide an explanation for our decision.

Keep in mind that these rights are subject to certain exemptions and may vary depending on the laws that apply to your data. We will always try to accommodate your request, but there may be situations where we cannot fulfill it fully — for example, if fulfilling a deletion request would prevent us from complying with a legal obligation. If your rights request conflicts with other legal requirements, we will let you know.

Finally, if you have concerns about how we handle your data, we encourage you to contact us first so we can address them. However, if you feel we have not adequately resolved an issue, you may have the right to lodge a complaint with a data protection authority or regulator in your country (if one exists in your jurisdiction).

## Third-Party Links

Our Site may include links to websites, plug-ins, or applications that are operated by third parties (for example, links to external resources, partners, or social media sites). Clicking on those links or enabling those connections might allow the third party to collect or share data about you. We want to make it clear that we **do not control** and are **not responsible for** the content or data practices of those third-party websites.

For your safety, we recommend that you read the privacy policy of every website you visit, especially if you follow a link from our Site. Those websites will have their own rules about how they collect and use personal information, which might differ from ours.

That said, we do value the integrity of our Site and welcome feedback about these third-party links. If you find that we have a link to a site with questionable content or practices, or if a link no longer works, please let us know. We will consider removing or fixing problematic links to ensure a better experience for our users.

## Children's Privacy

Our website and services are **not directed to children**, and we do not knowingly collect personal information from anyone under the age of 16 (or the minimum age required by the laws in your region, if different). We strive to comply with all applicable laws and regulations regarding the collection of data from minors.

If you are a parent or guardian and you believe that we have inadvertently collected personal information from your child, please contact us immediately at [support@keikowellness.com](mailto:support@keikowellness.com). We will take prompt steps to investigate and, if needed, delete that information from our records.

In the event that we ever offer services intended for minors (for example, a program for teenagers), we will only collect and use personal information of those minors with appropriate consent and in compliance with relevant child data protection laws (such as obtaining verifiable parental consent as required by laws like COPPA in the United States or similar regulations elsewhere). We would provide specific notices and choices to parents/guardians in those cases.

By using our Site, you represent that you are at least the age of majority in your state or province of residence, or that you are using the Site under the supervision of a parent or guardian.

## Changes to This Privacy Policy

We may update or change this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. When we make changes, we will update the "Last Updated" date at the top of this policy. For significant changes, we will also provide a more prominent notice of the update — for example, by posting a notice on our website's homepage or sending an email notification if appropriate.

Any changes to this Privacy Policy will become effective when the updated policy is posted on our Site. Your continued use of our Site or services after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates. We will always keep the latest version of the Privacy Policy accessible on our Site.

If we make changes that materially affect how we handle personal data (for example, if we decide to start collecting new types of personal information or sharing data with additional third parties), we will take steps to inform you in advance and, if required, to obtain your consent.

## Contact Us

Your privacy is important to us, and we welcome any questions or feedback you have about this Privacy Policy or our practices. If you:

- Have any questions or comments about this policy,
- Want to exercise any of your privacy rights described above, or
- Have a concern or complaint about how we handle your personal information,

please do not hesitate to contact us:

### **Keiko Wellness – Privacy Support**

Email: [support@keikowellness.com](mailto:support@keikowellness.com)

We will do our best to respond promptly and help resolve any issue or answer any questions you may have.

By using our Site and services, you acknowledge that you have read this Privacy Policy and agree to its terms. We appreciate your trust in us and will continue to work hard to protect your privacy.