PRIVACY POLICY

Welcome to www.blumcenterforhealth.com (the "Blum Center Site"), the site of the Blum Center for Health Education, LLC (the "Center" or "we"). On the Blum Center Site, among other things, you can find out how to arrange for a clinical visit/medical consultation at the Center, sign up for BlumKitchen™ cooking and mind/body/spirit Onsite Classes, obtain access to Online Educational Consultations provided by our faculty, link to Online Coaching Programs and blogs, and buy Supplements. Some of these Services are offered through our storefront at www.mindbodyonline.com, while our online coaching programs and blogs are offered on our affiliated site at www.blumhealthmd.com. In each case, when you click on a link for one of those services, you will be redirected to one of those two sites.

This privacy policy explains our practices regarding collection, use, and disclosure of personally identifying information that you may provide to us through the Blum Center Site and other information that we may collect passively as you use the Blum Center Site.

The personally identifying information we collect on the Blum Center Site

- If you sign up to "stay connected" at the bottom of our home page, or if you respond to the pop-up that appears on the Blum Center Site, we will ask you for your e-mail address. We will provide the e-mail address to Constant Contact (www.constantcontact.com), which maintains our e-mail list subject to its privacy policy at http://www.constantcontact.com/privacy_guarantee.jsp.
- If you buy anything through the Blum Center Site, whether it's a packaged product like a
 vitamin or an onsite class, you will need to set up an account with our online
 marketplace host/processor, MindBodyOnline (www.mindbodyonline.com). To set up an
 account, you will need to provide your first and last names, e-mail address, street
 address, phone number, and credit card/billing information. MindBodyOnline will handle
 that information according to its privacy policy at
 http://www.mindbodyonline.com/privacy-policy and will use it to send you a sign-up
 confirmation, and a purchase confirmation each time you buy something.
- In the "Medical Center" section of the Blum Center Site, if you request a live clinical appointment by emailing us, or if you request nutrition services by emailing, we will have your email address. If you want to request a live clinical appointment on the "medical consultation" section of the Blum Center Site by filling out our consultation form, you will need to provide your name, email address, cell phone number, and the top three health concerns that you are interested in learning about.
- In the "Onsite Classes" section of the Blum Center Site, if you register for a class, you will be taken to the Blum Center Store, which is hosted by MindBodyOnline (www.mindbodyonline.com). There, you will need to set up an account and provide your first and last names, e-mail address, phone number, and credit card/billing information. MindBodyOnline will handle that information according to its privacy policy at http://www.mindbodyonline.com/privacy-policy and will use it to send you a sign-up confirmation, and a purchase confirmation each time you buy something. Even after you set up an account, when you register for a particular class, you will need to provide a

current email address, just in case the one you provided when you opened your account is no longer active.

- In the "Tele-Education" section of the Blum Center Site, if you want to arrange for an online educational consultation, you will need to provide your name, email address, and cell number, and identify the health topic you want to learn about.
- If you click on the link to one of the online programs that we offer through our other
 website at www.blumhealthmd.com, you will be taken to that site and any personally
 identifying information that you provide there will be treated according to that site's
 privacy policy.
- If you become a member of our group Facebook® page or any Facebook® page that is associated with a particular program, we will have your Facebook® name.

Use of the personally identifying information that we collect on the Blum Center Site

Email address

- o If you sign up for the Center mailing list (by signing up at the bottom of our home page or by clicking on the popup box), we will use your e-mail address to send you, through Constant Contact, newsletters, information about special events, recipes from the Blum Center kitchen and other events and issues that we think may be useful to you.
- o If you buy something in the online store, we and/or MindBodyOnline may send you emails to keep you updated on the status of your order.
- o If you email us to ask for more information about a live clinical appointment, an onsite class, or an online educational consultation, we will use your email address to respond to you.
- o If you register for a class, we will use the email address you provided to email you updates about that class.
- If you dispute a charge that was made to your account by MindBodyOnline, MindBodyOnline may provide your email address to us and we may use it to contact you.

Street address

We will use your street address to send you whatever products you bought.

Phone number

 We will use your phone number to contact you if you ask us to contact you by phone.

- o We may use your phone number to notify you if a class is being rescheduled.
- o If MindBodyOnline advises us that you have disputed a charge, we may call you to discuss it

Disclosure of personally identifying information to third parties

- Credit-card processing. As noted above, when you buy something through the Blum Center Site for the first time, you will have to create an account with MindBodyOnline, and all subsequent purchases will be made through that account.
- Agents and contractors. We may provide your personally identifying information to
 other service providers who work on our behalf or help us to operate the Blum Center Site
 and the different activities that we conduct through and in connection with the Blum
 Center Site. Examples of such service providers include vendors and suppliers that provide
 us with technology, services and/or content for analyzing the operation of the Blum Center
 Site, provide advertising and marketing assistance and provide customer service. These
 service providers' access to your personally identifying information is limited to the
 information reasonably necessary to perform their limited functions.

Disclosure for legal reasons

- We may disclose your personally identifiable information to protect the safety, rights, or property of the public, any person, or the Center; to investigate, prevent, or otherwise address suspected fraud, harassment or other violations of any law, rule or regulation or our Terms of Use; to detect, prevent or otherwise address security or technical issues; or as we believe is required by law, regulation, or legal process.
- If we engage in a merger, acquisition, disposition, change of control, bankruptcy, dissolution, reorganization, or similar transaction or proceeding, or otherwise transfers the operations of the Blum Center Site that relates to your personally identifying information, we will transfer your personally identifying information to the successor entity.
- Rights of California residents. If you are a California resident, and you want to find
 out the names of any information brokers or any other third parties with whom we share
 your personally identifying information under California Privacy (Cal. Bus. & Prof. Code §
 22575 et seq., send a request to info@blumcenterforhealth.com and within thirty (30)
 days, we will provide you with that information.

Cookies and the information they collect

What cookies are. A cookie is a small data file that a website transfers to a user's hard
drive when a user visits the website. A cookie file can contain information such as a
unique ID that the site uses to track the pages visited and is a standard method of
registering website user preferences. These preferences are stored in a file on your
computer's hard disk drive.

- What they do. Cookies make it easier for you to use the Blum Center Site by enabling you to access your information when you "sign in" to your account, to make purchases and move uninterrupted between site areas.
- How you can control them. You can set your browser to accept all cookies, to reject cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. Rejecting a cookie, however, may preclude you from using, or may negatively affect the display or function of, the Blum Center Site or certain areas or features of the Blum Center Site. To learn more about cookies, including how to enable cookies, change your browser settings and find and delete cookies on your hard drive, please refer to your web browser's help menus or visit www.allaboutcookies.org.

How cookies are used on the Blum Center Site

- **Site analysis**. We use Google® Analytics to recognize and count the number of visitors to the Blum Center Site and to see how visitors move around the Blum Center Site when they're using it. Cookies also allow us to provide you with customized content, keep track of preferences you specify while visiting the Blum Center Site, conduct general analysis and research, and identify purchases that you make in response to our advertising.
 - o If you do not want your data collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) running on websites to prohibit sending information to Google Analytics. To opt out of Google Analytics, visit the Google Analytics opt-out page and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser. Updates to your browser or operating system may affect the functionality of the opt-out add-on. You can learn about managing add-ons for Chrome here.

Interest-based advertising

- o If you visit the Blum Center Site as a result of a search on Google® or Yahoo® or another search engine, that search engine may serve you ads for other home-based education products and services when you are on other websites with their networks.
- o We also use Google® remarketing tags, which are a kind of cookie, to advertise to users who have visited the Blum Center Site even when they are not on the Blum Center Site and when they are not using a search engine to look for us. For example, if you have visited the Blum Center Site in the last thirty days, you could be on an auto parts website and you might see an ad for the Center, just because you previously visited the Blum Center Site.
- You can choose to limit this kind of behavioral advertising by Google by going to <u>https://tools.google.com/dlpage/gaoptout_and.opting.out.of.interest-based.ads.on.google.</u>
 To opt out from a list of vendors in addition to Google, go to http://www.aboutads.info/choices/. After you opt out, you will still see

advertisements when you are online, but the advertising may not be as relevant to your interests. If you change your computer, change your browser, or delete your cookies, you will need to renew your opt-out.

Web beacons and the information they collect

We may also use an application known as a "web beacon." A web beacon is an electronic
file that usually consists of a single-pixel image that is used in combination with a cookie
or cookies. A web beacon can be placed on a web page or in an email to transmit
information, which could include personally identifying information.

How web beacons are used on the Blum Center Site

• If you are on the Blum Center Site when the Facebook web beacon is running, and then we run a "like" campaign on Facebook when you are on Facebook, you will see a "Like us" ad for the Center. We also may use web beacons to assist in tracking and analyzing advertising effectiveness, verify purchases made on the Blum Center Site, count and recognize site visitors, and personalize your experience.

"Do Not Track" Signals

- With some browsers, it is possible for a user to activate a "Do Not Track" signal, to indicate that the user does not want to be tracked across the websites that the user visits.
- The Blum Center Site does not respond to Do Not Track signals. In other words, if you
 have activated a Do Not Track signal in your own browser, the Blum Center Site will not
 block tracking by Google, its affiliates, or anyone else of your activity on the Blum Center
 Site.

Management of your personally identifying information on the Blum Center Site

• To keep your personally identifying information accurate, current, and complete, you can log in to your own account at https://blumcenterforhealth.com/ or you can contact info@blumcenterforhealth.com.

Storage of information

• We store all information that we collect on the Blum Center Site on servers operated by third parties. These servers may be located in the United States or in other jurisdictions.

Transfer of information

- We may transfer information that we collect about you, including personally identifying information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world.
- If you are located in the European Union or other regions whose laws governing data collection and use may differ from the laws of the United States, please note that we may

transfer information, including personally identifying information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of such information to the U.S. or any other country in which we or our service providers operate or maintain facilities.

Security

- We use SSL certificates to protect your personal information as you transmit it from your computer to the Blum Center Site and to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We also use a software program to stop certain kinds of attacks. But no Internet transmission is ever 100% secure or error-free. In particular, e-mail sent to or from the Blum Center Site may not be secure. Be careful about sending us any confidential information, and keep secure any passwords, ID numbers, or other special access features that you use on the Blum Center Site.
- We will retain your personally identifying information for the period necessary to fulfill the purposes outlined in this privacy policy or our data retention policies unless a longer retention period is required by law.
- The Blum Center Site may contain links or references to other sites in addition to the ones we have already mentioned. Please be aware that <u>we do not control such other sites</u> and that, in any case, <u>this privacy policy does not apply to those sites</u>. We encourage you to read the privacy policy of every site you visit.

Protection of information

- You are responsible for maintaining the privacy of your unique password and account information and for controlling access to your communications from the Blum Center Site at all times.
- Your personally identifying information will be stored in secure third-party data centers. Nevertheless, we cannot (i) ensure or warrant the security of any personally identifying information that you transmit when you use the Blum Center Site or (ii) guarantee that information stored on or transmitted through the Blum Center Site may not be accessed, disclosed, altered, or destroyed. If any personally identifying information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation, and where appropriate, we will notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

Children

We do not knowingly collect personally identifying information from anyone under 13. If
we become aware that a child under 13 has provided us with personally identifying
information, we will take steps to remove such information and terminate the child's
account.

• If you are a parent and you become aware that your child has provided us with personally identifying information without your consent, please contact us at info@blumcenterforhealth.com and we will take steps to remove such information and close the child's account.

Changes to this privacy policy

• If this privacy policy changes, the revised policy will be posted here. Please check back periodically, and especially before you provide any personally identifying information.

This privacy policy was last updated on March 20, 2018.