

ONA HEALTH SOLUTIONS INC.

Privacy Policy

Last modified: 2nd January 2026

INTRODUCTION

ONA HEALTH SOLUTIONS INC. ("**Company**", "**we**", "**our**", or "**us**") respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you download, install, create an account on, access, or use our website, <https://ona.health> including any content, functionality, and services offered on or through <https://ona.health> and any other websites, sub websites and sub domains that we may later own or operate (each a "**Website**" and collectively the "**Websites**"), the downloadable application (the "**Application**" or "**App**"); all services, features, content and other products provided by Company through the Websites or App (collectively "**Service**" or "**Services**") whether provided by us or our affiliates, whether as a guest or a registered user.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in through our Services and in email, text, and other electronic communications sent through or in connection with our Services.

This policy DOES NOT apply to information that:

- You provide to or is collected by any third party, including other apps, websites, or content that may link to or be accessible from or through the Services (see [Third-Party Information Collection](#)). These other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, DO NOT DOWNLOAD THE APP, CREATE AN ACCOUNT, OR ACCESS OR OTHERWISE USE OUR SERVICES. BY DOWNLOADING, CREATING AN ACCOUNT, ACCESSING OR OTHERWISE USING OUR SERVICES, YOU AGREE TO THIS PRIVACY POLICY. THIS POLICY MAY CHANGE FROM TIME TO TIME (SEE [CHANGES TO OUR PRIVACY POLICY](#)). YOUR CONTINUED USE OF THE SERVICES AFTER WE REVISE THIS POLICY MEANS YOU ACCEPT THOSE CHANGES, SO PLEASE CHECK THE POLICY PERIODICALLY FOR UPDATES. HOWEVER, IF WE MAKE MATERIAL CHANGES TO HOW WE TREAT OUR USERS' PERSONAL INFORMATION, IT IS OUR POLICY TO NOTIFY YOU BY EMAIL TO THE PRIMARY EMAIL ADDRESS SPECIFIED IN YOUR ACCOUNT AND/OR THROUGH A NOTICE ON THE SERVICES HOME PAGES.

CHILDREN UNDER THE AGE OF 16

The Services are not intended for children under 16 years of age. No one under age 16 may provide any information from children under 16. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on the Services, or through any of their features, or create an account on our Services, or make any purchases through our Services, use any of the interactive or public comment features of the Services, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at legal@ona.health.

Residents of certain states under 13, 16, or 18 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Your State Privacy Rights](#) for more information.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect information from and about users of our Services:

- Directly from you when you provide it to us.
- Automatically when you access or use the Services.
- From the devices that you connect with our Services.

Wellness Advice Only

This policy governs information collected for wellness-based services. All data processed—including hormonal patterns, lifestyle inputs, and biomarker insights—is used solely to provide educational and motivational wellness advice. This data is not treated as a medical record for the purpose of clinical diagnosis or treatment

Information You Provide to Us

When you create an account, download, or otherwise access or use the Services, we may ask you to provide information:

- By which you may be personally identified, such as your name (including a username) and email address, or any other identifier by which you may be contacted online or offline ("**personal information**"). Note that we request a generic username by which you would like to be addressed and do not require you to provide your actual name as it appears in your government identification records. For instance, you may choose to use a nickname to create your account rather than your actual first and last name. Note also that although we may collect your name and email address for the purpose of creating the account, we do not directly link this information to any other information collected via the Services, such as information about your health or medical conditions. However, we generate a unique identifier after your account is created for the purpose of identifying your device(s) whenever you access the Services.
- That is about you but individually does not identify you, such as age, height, weight.
- That concerns your health or medical condition and constitutes or may constitute sensitive personal information such as medical symptoms, medical conditions, medical history, diet, body temperature, medications, hormonal-birth-control use, lab results (such as blood and hormonal test results), in order to provide our Services as a health-based app.

We also collect the following information from you through the sources referenced in this section:

- Information that you provide by filling in forms in the Services. This includes information provided at the time of creating an account on the Services, and subscribing to our Services, posting any information, and requesting further services. We may also ask you for information when you report a problem with the Services.

- Records and copies of your correspondence with us (including email addresses and phone numbers), if you contact us by such means.
- Your responses to surveys that we might ask you to complete for research purposes.
- Assessment-interview data.
- Details of transactions you carry out through our Services and of the fulfillment of your orders. You may be required to provide financial information (bank account/credit card or debit card details) before placing an order through the Services.
- Your search queries on the Services.
- Your conversations with our AI agent. As further described below, we may use this information to train our internally developed artificial intelligence systems (AI Systems). If you do not want us to use your conversations to train our AI Systems, you can opt out by adjusting your user preferences in your account profile or sending us an email stating your request to legal@ona.health.

Information Posted on Public Areas

You may also provide information for publication or display (“**Post**” or “**Posted**”) on public areas of the Services or websites you access through the Services, including through any of our community features (collectively, “**User Contributions**”). Your User Contributions are Posted and transmitted to others at your own risk. Although we may limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Services with whom you may choose to share your User Contributions especially when they are Posted. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. If you do not want any information to be shared on public areas of the Services or public areas of other platforms you may access through the Services, please do not Post such information on public areas of the Services or of such other Platforms.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with the Services, including when you download, access, or use the App, we may use automatic data collection technologies to collect certain information about your device and your browsing and usage activity and patterns, including:

- **Usage Details.** When you access and use our Services, we may automatically collect certain details of your access to and use of our Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through our Services.
- **Device Information.** We may collect information about your devices and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Stored Information and Files.** We may also access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips.
- **Location Information.** We collect real-time information about the location of your device if you enable the location feature by selecting it in your device settings.

The information we collect automatically does not include personal information, but we may maintain it or associate it with certain personal information we collect directly from you in other ways or

information we receive from third parties. This information helps us to provide our Services to you, improve our Services and to deliver a better and more personalized service to you, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website or App.

If you do not want us to collect this information, you may opt out at any time by adjusting your user preferences on either the App or Website or to the extent applicable by disabling the relevant features in your device settings or you may delete the App. For more information, see [Your Choices About Our Collection, Use, and Disclosure of Your Information](#). However, please note that opting out of our collection of location information will disable the Services location-based features.

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your device. It may be possible to refuse to accept cookies by activating the appropriate setting on your device. However, if you select this setting you may be unable to access certain parts of our Services.
- **Web Beacons.** Pages of the Services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

For more information on how we use Cookies and other tracking technologies and how and when you can opt out of such use, please see our [Cookie Policy](#).

Third-Party Information Collection

When you use the Services or their content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use the Services. Although we do not share or sell your personal information to any third parties, the information these third parties collect may be associated with your personal information, or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites in ways outside our control. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the Services and their contents, and any other information, products, or services that you request from us including personalized nutrition, lifestyle and supplementation suggestions.
- Fulfill any other purpose for which you provide it.
- Give you notices about your account/subscription, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when updates are available, and of changes to any products or services we offer or provide through our Services.

The usage information we collect helps us to improve our Services and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Services.

We use location information we collect to display certain location-oriented features in the Services.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile. For more information, see [Choices About How We Use and Disclose Your Information](#).

We may use the information we collect to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

USING THIRD PARTY INTEGRATIONS

Optional connection. You may choose to connect third-party devices or services - such as **Daisy** - to the App to enrich your profile and features. These third parties operate under **their own terms and privacy policies** and collect your data as **independent controllers**. We do not control how they collect or use data in their services; please review their policies before connecting.

What we receive (after you authorize). Depending on the integration and your settings, we may receive measurement/sensor data (e.g., basal body temperature and related fertility indicators for Daysy), activity or cycle entries, timestamps, and basic device metadata needed for synchronization (“**Integration Data**”).

How we process Integration Data. We process Integration Data to:

- display it in your App profile;
- generate insights and provide requested features (e.g., notifications, backup, support); we might connect with relevant third parties to do so;
- maintain the security and performance of the integration.

Legal bases. We process Integration Data based on your **consent** and/or to **perform a contract** with you. If Integration Data includes **health information**, we process it only with your **explicit consent**.

Where we store and process. After you connect, Integration Data is first stored on our servers in the **European Union**. To deliver the App experience, we may securely transfer and process a copy on our servers in the **United States**. This is perishable and purely for processing purposes (e.g. AI analysis).

International transfers & safeguards. When transferring Integration Data outside the EEA, we use appropriate safeguards and additional technical/organizational measures. Where applicable, we may also rely on participation in the **EU–U.S. Data Privacy Framework** by relevant entities or providers.

Retention. We keep Integration Data while your account is active or as needed to provide the integration. If you request deletion, we delete Integration Data obtained via that integration within a reasonable period, unless we must retain it to meet legal obligations.

Your choices. You can connect or disconnect integrations anytime in **Settings**. Disconnecting stops new data flows. You may request access, correction, deletion, restriction, or portability at any time and may withdraw consent (including explicit consent for health data) without affecting processing carried out before withdrawal.

Roles. Within the App, **we** act as controller for the processing described above. Each third-party device/service (e.g., **Daysy**) remains a separate, independent controller for its own service and data practices.

USING YOUR INFORMATION IN ARTIFICIAL INTELLIGENCE TECHNOLOGY

We use our AI Systems to provide you with the Services. In general, our AI Systems generates insights (the “**Output**”) based on the information processed on and through the Services, as entered by you (the “**Input**”).

Our AI Systems are built on top of third-party Large Language Models (“**LLMs**”) and other third party Machine Learning (“**ML**”) models and we incorporate them in providing you the Services as described above. The use of LLMs in our Services ranges from assisting us in analyzing and formatting your Input such as your description of your symptoms, assisting and amending the Output of our AI Systems such as and suggesting possible health conditions based on your description of your symptoms, or informing overall product improvements.

We have signed data processing agreements with each provider, ensuring that they only process your data according to our instructions and for our purposes. During the use of our AI Systems n , personal

information about you might be generated out of existing information provided or collected and used by you. The information which you provide to us, including your health information and your conversations with our AI agent, may be used for improving our AI Systems . However, your information will not be used for training any third-party LLM or ML model and will be processed in accordance with this Privacy Policy.

By using the Services and providing such information, you agree to our use of your information (including your health information) for the purpose of providing you with the Services and also for the purpose of improving our AI Systems. You can opt out from our use of your information (including your health information) to improve our AI Systems by adjusting your user preferences in the App's settings or by emailing us at legal@ona.health. For clarity, please note that we are not able to process a request to opt out of using your information in our AI Systems for the purpose of providing you with the Services and you will need to stop using our Services and delete your account if you would no longer like us to use your information (including your health information) in our AI Systems provide you with the Services.

DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates.
- To our service providers, vendors, contractors, professional service advisors (such as legal advisors, accountants and consultants) and other third parties who we use to support us in providing the Services or advise us on the scope of our rights and obligations and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- For any other purpose or to any other party, on your request or with your consent.
- To our Wellness Consultants and Coaches. We may disclose your personal information, including your hormonal health patterns and lifestyle inputs, to our wellness coaches, nutritionists, or naturopathic consultants (collectively, "Wellness Consultants") for the purpose of providing you with personalized wellness consultations and advice. These Wellness Consultants are bound by contractual obligations to keep your information confidential and are prohibited from using it for any purpose other than providing non-medical wellness support through our Services. Access to your data is limited to the information necessary for them to facilitate your specific wellness sessions.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including our [Terms of Service](#), and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We do not sell or share your information with any third parties for monetary gain.

Under certain state laws (including California), if we disclose personal information to a third party for any benefit, this can be considered a “sale” or “share” of personal information, even if the third party does not use the personal information for any other purpose. Under certain laws (including California), it is considered “sharing” personal information if we disclose personal information to a third party for purposes of cross-context behavioral advertising even if we do not make any direct gain from such sharing. We currently do not intentionally share or disclose in any manner any personal information and specifically your health information with any third parties for cross-context behavioral advertising or targeted advertising of any form.

SOCIAL LOGINS

When first creating your account, you may have the option to sign up with Google. We use “*Sign in with Google*” to allow users to create and sign in to their account with their Google credentials. If you use this service, you authorize us to collect your basic information from Google, like your email address. You can manage this any time in your Google account. Please see [Google's Support Resources](#) for more details on this.

If you sign up to our Services using Google, we will exchange with Google the types of data you provided to Google when creating an account with them (such as name, email address). This may include a transfer of your personal data to Google servers located outside the United States. It is your choice if and to what extent you use the “Sign in with Google” service and what information you provide to Google. For the avoidance of doubt, absolutely no health data will be exchanged with Google.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding your personal. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. You can choose whether or not to allow the Services to collect information through other tracking technologies by opting out of the use of other tracking technologies on the Services through adjusting your user preferences in the App settings t. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Services may then be inaccessible or not function properly. For more information about how we uses cookies and other tracking technologies and your rights in relation to such use, please see our [Cookies Policy](#).

- **Location Information.** You can choose whether or not to allow us to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of the Services may become inaccessible or not function properly.
- **Promotion by the Company.** If you do not want us to use your email address or other contact information to promote our own or third parties' products or services, you can also opt-out by adjusting your user preferences in your account profile or by clicking "Unsubscribe" in any marketing or promotional emails or by sending us an email stating your request to legal@ona.health.
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to ours or our advertisers' (if any) target-audience preferences, you can opt-out by adjusting your user advertising preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to legal@ona.health.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Residents in certain states, such as California, may have additional personal information rights and choices. Please see [Your State Privacy Rights](#) for more information.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You can review and change your personal information by logging into your account and visiting your account profile page.

You may also send us an email at legal@ona.health to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may also not accommodate a request to delete information which will cause the Services to malfunction.

If you delete your User Contributions, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other users. Proper access and use of information provided on the Services, including User Contributions, is governed by our [Terms of Use](#).

Residents in certain states, such as California, may have additional personal information rights and choices. Please see [Your State Privacy Rights](#) for more information.

YOUR STATE PRIVACY RIGHTS

Many states, including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).

- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa);
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data or process personal data of minors under 18, 17, or 16 years old.

The exact scope of these rights may vary by state. To exercise any of these rights please email us at legal@ona.health.

NOTICE TO CALIFORNIA RESIDENTS

If you reside in California, you may have certain additional rights regarding your “personal information” as defined under the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act, collectively, “CCPA”) or otherwise. This section of our Policy supplements the information provided elsewhere in this Privacy Policy.

The below chart shows you where to find details about the information to which you may be entitled under the CCPA in this Privacy Policy:

CCPA Information Requirement	Corresponding Information in this Privacy Policy
Categories of personal information collected	<p>INFORMATION WE COLLECT AND HOW WE COLLECT IT In general, we collect information in the following categories as defined by the CCPA: identifiers such as your name and email address; personal information described by California Civil Code Section 1798.80(e); health information, characteristics of protected classifications under federal or California law; commercial information; and internet, browser and device information.</p>
Categories of sources from which we collected personal information	<p>INFORMATION WE COLLECT AND HOW WE COLLECT IT In general, we collect information directly from you. This includes information you provide to us when you use the Services and information we collect through the use of cookies, pixels or other tracking technologies on our website.</p>
The business purpose for which we collected your personal information	<p>HOW WE USE YOUR PERSONAL INFORMATION In general, we use your Personal Information to provide our Services and to operate, improve, and communicate with you about our Services.</p>
Categories of information shared or disclosed to third parties, and the categories of third parties to which	<p>DISCLOSURE OF YOUR PERSONAL INFORMATION In general, we share information in the following categories as defined by the CCPA: identifiers; personal information described by</p>

CCPA Information Requirement	Corresponding Information in this Privacy Policy
we shared or disclosed that information	<p>California Civil Code Section 1798.80(e); characteristics of protected classifications under federal or California law; and commercial information.</p> <p>We only share this information with third service providers involved in providing Services to you. We do not share your personal information (including health information) with any third parties for the purpose of cross-context behavioral advertising or any other form of advertising by such third parties. We do not sell or share your personal information (including health information) for any monetary gain.</p>

In addition, California consumers may have the following rights under the CCPA:

- To request that we disclose what Personal Information we collect, use, or disclose about you.
- To know the specific pieces of Personal Information we hold about you.
- To request the deletion of your Personal Information, with some exceptions.
- To correct inaccurate Personal Information about you.
- To request that we stop selling or sharing your Personal Information.
- Submitting Requests. California residents have the right to limit the use of their Sensitive Personal Information.
- You may submit requests to opt-out of sale or sharing, correct, delete, and know specific Personal Information and/or categories of Personal Information we have collected about you by contacting us at legal@ona.health.
- Verification of Your Identity. When you exercise these rights and submit a request to us, we or our partners will verify your identity by asking you to authenticate your identity via standard authentication procedures. For example, we may ask for your email address, full name, or street address. We also may use a third-party verification provider to verify your identity.
- Non-Discrimination. If you make a request under the CCPA, we will not discriminate against you in any way. For example, we will not deny you goods or services, charge you different prices or rates for goods or services, deny you discounts or other benefits or impose penalties on you, or provide you with or suggest that you will receive a different level or quality of goods or services.
- Automated Decision-Making. We generally do not use automated decision-making technology, as that term is defined by the CCPA. If we make use of automated decision-making technology, you will be informed through a separate privacy notice.
- Record Retention. We may retain your Personal Information only for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements. We strive to retain your Personal Information no longer than is reasonably necessary to carry out the purposes listed in this Privacy Policy or as required by law. We retain your Personal Information following the end of our arrangement in accordance with applicable law and our data retention and destruction policies.
- We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

- Do Not Track Disclosure** - Certain web browsers may allow you to enable a “do not track” option that sends signals to the websites you visit indicating that you do not want your online activities tracked. This is different from blocking cookies as browsers with the “do not track” option selected may still accept cookies. Right now, there is no industry standard for how companies should respond to “do not track” signals, although one may be adopted in the future. We do not respond to “do not track” signals at this time. If we do so in the future, we will update this policy accordingly. To request that we do not track your online activities, please send a request to legal@ona.health

Personal Information Category	Category(ies) of Third-Party Recipients	Business Purpose
A: Identifiers.	Service providers	To provide our Services to you
B: California Customer Records personal information categories.	Service providers	To provide our Services to you
C: Protected classification characteristics under California or federal law (such as health information).	Service providers	To provide our Services to you
D: Commercial information.	Service providers	To provide our Services to you
E: Biometric information.	None	N/A
F: Internet or other similar network activity.	Service providers	To provide our Services to you
G: Geolocation data.	None	N/A
H: Sensory data.	None	N/A
I: Professional or employment-related information.	None	N/A
J: Non-public education information.	None	N/A
K: Inferences drawn from other personal information.	None	N/A

You can exercise your rights by contacting us via email at legal@ona.health .

EUROPEAN ECONOMIC AREA RESIDENTS

If you reside in the European Economic Area (EEA), you may have certain additional rights regarding your personal data relating to you (in this section of the Privacy Policy “**Personal Data**”) as defined under the regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**GDPR**”). This section of our Policy supplements the information provided elsewhere in this Privacy Policy for residents of the EEA. In case of processing personal data of you either as a natural person or a legal entity’s representative located in the EEA, the GDPR shall apply. Furthermore, the recommendations of the Article 29 Data Protection Working Party (“**WP29**”) and of the European Data Protection Board (“**EDPB**”) shall be observed.

Data Controller

If you live in the EEA, Ona Health Solutions Inc. with its registered office at 251 Little Falls Drive, Wilmington, DE 19808, is the controller and is responsible for the processing of your personal data as described in this Privacy Policy.

Personal Data we Collect

In general, we collect Personal Data in the following categories as defined by the GDPR as also described under [Information We Collect and How We Collect It](#):

- **Identity Data:** First name, last name, username or similar identifier, date of birth, gender.
- **Contact Data:** Email address, telephone number, billing address, delivery address.
- **Technical Data:** IP address, browser type and version, device identifiers, operating system and platform, and other technology on the devices you use to access our services.
- **Usage Data:** Information about how you use our App, website, products, and Services, including interaction logs, page views, clicks, and navigation paths.
- **Profile Data:** Username and password, preferences, feedback, and survey responses.
- **Communication Data:** Records of your communications with us, including emails, messages, support requests, Conversations with our AI Agent.
- **Health or Special Category Data:** Only where explicitly required and with your explicit consent, we collect sensitive data such as your health information, including medical symptoms, medical conditions, medical history, diet, medications, hormonal-birth-control use, lab results (such as blood and hormonal test results). You can withdraw your consent to our collection of such Personal Data at any time in your account settings or by contacting us.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.

How we Collect your Personal Data

In general, we collect Personal Data that you provide to us or through automatic information collection technologies while you are using the Services. This includes Personal Data we collect through the use of cookies, pixels or other tracking technologies. Please refer to [Information We Collect and How We Collect It](#) above for more information on how we collect your Personal Data.

How we use your Personal Data

We may use Personal Data for the following purposes:

- To provide analyze, and maintain our Services, for example to analyze your symptoms and suggest possible medical diagnoses based on such symptoms - please not we never offer final diagnosis as we are not a medical service;
- To improve and develop our Services and conduct research, for example to develop new product features;
- To communicate with you, including to send you information about our Services and events, for example about changes or improvements to the Services;
- To prevent fraud, illegal activity, or misuses of our Services, and to protect the security of our systems and Services;
- To comply with legal obligations and to protect the rights, privacy, safety, or property of our users or third parties.
- We may also aggregate or de-identify Personal Data so that it no longer identifies you and use this information for the purposes described above, such as to analyze the way our Services are being used, to improve and add features to them, and to conduct research. We will maintain and use de-identified information in de-identified form and not attempt to reidentify the information, unless required by law.

For more information on how we use your Personal Data, please refer to [How We Use Your Information](#).

Your Rights with respect to your Personal Data

Under the GDPR, you have the following rights:

- **Right of Access** – To know what personal data we hold about you
- **Right to Rectification** – To correct inaccurate or incomplete data
- **Right to Erasure (“Right to be Forgotten”)** – To request the deletion or removal of your Personal Data from our records
- **Right to Restriction of Processing** – To restrict how we process your Personal Data
- **Right to Data Portability**
- **Right to Object** – To object to our processing of your Personal Data for direct marketing at any time or to object to how we process your Personal Data when our processing is based on legitimate interests.
- **Right to Withdraw Consent** – You can withdraw your consent to our processing of your Personal Data at any time, without affecting prior processing
- **Right to Lodge a Complaint** – You have a right to file a complaint with a data protection authority or other applicable supervisory authority in your country

To exercise any of these rights, please email us at: legal@ona.health

Disclosures of Personal Data

We only disclose your personal data where it is necessary for specific purposes, in accordance with the General Data Protection Regulation (GDPR). All such disclosures are supported by a valid legal basis and are subject to appropriate safeguards. We disclose your Personal Data to the following persons.

- **Service Providers:** We share personal data with trusted third-party service providers that help us deliver, operate, and improve our services. These include cloud hosting providers, data analytics platforms, IT support services, and security providers. These entities act as data processors under the GDPR and are bound by data processing agreements (DPAs) that ensure they act solely under our instructions and implement appropriate technical and organizational measures to protect your data. If you use social logins such as Google Signup to create an account, we may also exchange the data necessary to create an account with Google solely for the purpose of creating your account.
- **Affiliates:** We may disclose Personal Data to our affiliates, meaning an entity that control, is controlled by, or is under common control with Company. Our affiliates may use this Personal Data in a manner consistent with this Privacy Policy
- **Payment Processors:** When you make a payment through our app, we may disclose relevant Personal Data to payment service providers to process transactions. No special category data (e.g., health data) is shared for payment processing.
- **Professional Advisors:** We may share personal data with professional advisers such as lawyers, auditors, or consultants where reasonably necessary for legal, financial, or tax purposes. These disclosures are based on our legitimate interests and are protected by obligations of confidentiality and, where applicable, processor agreements.
- **Legal and Regulatory Disclosures:** We may disclose personal data to public authorities, regulators, or law enforcement agencies if required to comply with legal obligations, such as tax or health regulations.
- **Social or Interactive Features:** Where our Services include features allowing interaction between users (e.g., community boards or chat functions), any data you choose to share will be visible to others. Such disclosures occur only with your explicit consent, and we will provide clear settings to manage visibility and sharing preferences.
- **Business Transfers:** In the event of a merger, acquisition, corporate restructuring, or sale of all or part of our business, we may transfer your data to the relevant third party. We will notify you where required and ensure the recipient provides an equivalent level of data protection.
- **No Sale or Automated Decisions:** We do not sell your personal data to any third parties. Additionally, we do not use automated decision-making, including profiling, that produces legal or similarly significant effects on you without your explicit consent and appropriate safeguards.

Legal Bases for Processing

Purpose of Processing	Categories of Personal Data	Legal Basis for Processing
To provide and maintain our Services (e.g., analyse your menstrual and hormonal health data and suggest a list of possible health conditions, recommend possible lifestyle changes)	Identity, Contact, Health and Communication, Usage, Profile Data	Contractual necessity
To process sensitive health data (e.g., menstrual cycle, fertility, pregnancy)	Special category (Health Data)	Explicit consent
To personalize user experience and our Services features	Usage, Health, Profile Data	Consent

To communicate with you (e.g., reminders, updates)	Contact Data	Consent (for marketing) or legitimate interests (for service communications)
To improve our app, troubleshoot, and conduct analytics	Technical, Usage Data	Legitimate interests (ensuring functionality and improvement)
To comply with legal obligations (e.g., consumer rights, tax, or regulatory requirements)	Identity, Contact Data	Legal obligation
To protect our rights, prevent fraud or misuse	All relevant data	Legitimate interests or legal obligation

International Data Transfers

We may process your Personal Data on servers located outside of the EEA for the purposes described in this Privacy Policy. This may include processing and storing your Personal Data in our facilities and servers in locations outside of the EEA. While data protection law varies by country and these countries may not offer the same level of data protection as your home country, we apply the protections described in this policy to your Personal Data regardless of where it is processed. When transferring Personal Data outside of the EEA, we rely on the following transfer mechanisms to comply with applicable data protection law:

- We rely on the European Commission's adequacy decisions pursuant to Article 45(1) GDPR when transferring your Personal Data to any country that has been considered to provide an adequate level of protection.
- For other jurisdictions, we rely on the Standard Contractual Clauses ("SCCs") as approved by the European Commission pursuant to Article 46(2)(c) GDPR.
- For more information or to obtain a copy of the appropriate safeguards we have in place when transferring Personal Data, please contact us at legal@ona.health

How to Contact Us

Please contact us at legal@ona.health if you have any questions or concerns not already addressed in this Privacy Policy.

You can contact our Data Protection Officer at legal@ona.health in matters related to Personal Data processing.

DATA SECURITY

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The information you provide to us is stored on our secure servers behind firewalls or with an authentication provider. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the App. The information you share in public areas may be viewed by any user of the App.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures included through the App.

DATA RETENTION

We will retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes, and enforce our agreements. You may request that we delete your data by contacting us, as provided in this Privacy Policy. However, we may not be able to honor that request in all instances, given the laws and regulations that apply to us. For example, under state and federal law, we may be required to maintain some data that is specific to you and that may identify you, such as your medical records or other information. We may also have a legal basis or obligation to maintain medical and other information about you to provide care and treatment or to comply with our professional, legal and other obligations.

CHANGES TO OUR PRIVACY POLICY

We may update our privacy policy from time to time. Your continued use of the Services after we revise this policy means you accept those changes, so please check the policy periodically for updates. However, if we make material changes to how we treat our users' personal information, it is our policy to notify you by email to the primary email address specified in your account and/or through a notice on the Services home pages.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this privacy policy to check for any changes.

CONTACT INFORMATION

To ask questions or comment about this privacy policy and our privacy practices, contact us at: legal@ona.health

To register a complaint or concern, please contact us at: legal@ona.health