



FULL PRIVACY POLICY

Effective 10/05/2020

WE AT DYNABLISS VALUE YOUR PRIVACY AND ARE COMMITTED TO KEEPING YOUR PERSONAL DATA CONFIDENTIAL. WE USE YOUR DATA SOLELY IN THE CONTEXT OF HELPING YOU BY PROVIDING PRACTICE MANAGEMENT SOFTWARE THAT ALLOWS THE ABILITY TO SCHEDULE APPOINTMENTS, CHART PATIENT NOTES, TRACK IMPORTANT DEMOGRAPHIC AND INSURANCE INFORMATION, BILL PATIENTS, MANAGE INVENTORY, COMMUNICATE WITH PATIENTS, AND VIEW RELEVANT REPORTING DATA ABOUT YOUR PRACTICE.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA DYNABLISS COLLECTS FROM USERS OF ACUBLISS™ AND DYNABLISS'S WEB SITE (THE "APPLICATIONS"). **"PERSONAL DATA" INCLUDES ANY INFORMATION THAT CAN BE USED ON ITS OWN OR WITH OTHER INFORMATION IN COMBINATION TO IDENTIFY OR CONTACT ONE OF OUR USERS.** WE BELIEVE THAT TRANSPARENCY ABOUT THE USE OF YOUR PERSONAL DATA IS OF UTMOST IMPORTANCE. IN THIS PRIVACY POLICY, WE PROVIDE YOU DETAILED INFORMATION ABOUT OUR COLLECTION, USE, MAINTENANCE, AND DISCLOSURE OF YOUR PERSONAL DATA. THE POLICY EXPLAINS WHAT KIND OF INFORMATION WE COLLECT, WHEN AND HOW WE MIGHT USE THAT INFORMATION, HOW WE PROTECT THE INFORMATION, AND YOUR RIGHTS REGARDING YOUR PERSONAL DATA.

THE PERSONAL DATA WE COLLECT AND TRANSMIT MAY, IN SOME CIRCUMSTANCES, BE CONSIDERED "HEALTH DATA" (data related to a person's physical or mental health). THEREFORE, OUR PRIVACY PRACTICES ARE INTENDED TO COMPLY WITH THE GENERAL DATA PROCESSING REGULATION ("GDPR") PROVISIONS REGARDING SENSITIVE PERSONAL DATA. IN ADDITION, WE INTEND TO COMPLY WITH STATE LAW RELATED TO HEALTH DATA, WHERE APPLICABLE. FOR ADDITIONAL INFORMATION RELATED TO YOUR HEALTHCARE INFORMATION, PLEASE CONTACT OUR PRIVACY OFFICER AT privacy@dynabliss.com.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. For the purposes of Applicable Data Protection Laws including the European Economic Area data protection law, (the "Data Protection Law"), the data controller is:

Loc Huynh – privacy@dynabliss.com

BY SUBMITTING YOUR PERSONAL DATA THROUGH THIS APPLICATION, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS POLICY. IF YOU DO NOT AGREE, PLEASE DO NOT LOG INTO OR ACCESS THE APPLICATIONS AND DO NOT SUBMIT ANY PERSONAL DATA TO US.

PLEASE NOTE THAT **WE OCCASIONALLY UPDATE THIS PRIVACY POLICY AND THAT IT IS YOUR RESPONSIBILITY TO STAY UP TO DATE** WITH ANY AMENDED VERSIONS. IF WE MODIFY THE PRIVACY POLICY, WE WILL POST A LINK TO THE MODIFIED TERMS AVAILABLE ON THE WEBSITE. WE WILL ALSO NOTIFY YOU VIA EMAIL. YOU CAN STORE THIS POLICY AND/OR ANY AMENDED VERSION(S) DIGITALLY, PRINT IT, OR SAVE IT IN ANY OTHER WAY BY CLICKING [HERE](#). ANY CHANGES TO THIS PRIVACY POLICY WILL BE EFFECTIVE IMMEDIATELY UPON PROVIDING NOTICE, AND SHALL APPLY TO ALL INFORMATION WE MAINTAIN, USE, AND DISCLOSE. IF YOU CONTINUE TO USE THE APPLICATION FOLLOWING SUCH NOTICE, YOU ARE AGREEING TO THOSE CHANGES.

CAPITALIZED TERMS, IF NOT DEFINED IN THIS PRIVACY POLICY, ARE DEFINED IN THE TERMS AND CONDITIONS, WHICH IS ACCESSIBLE [HERE](#) for Staff and Practitioners and [HERE](#) for Patients.

In case you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact us at privacy@dynabliss.com. We appreciate your feedback.

Responsible Entity

DynaBliss, Inc. ("We", "Us", "the Company") is the controller of your Personal Data and may process this data in accordance with the Privacy Policy. If we are processing Personal Data on behalf of a third party that is not an agent or affiliate of Company, the terms of this Privacy Policy do not apply—instead, the terms of



that third party's privacy policy will apply. You can reach our data protection officer with any questions about our Privacy Policy at privacy@dynabliss.com.

Links to Other Sites

Our Applications may contain links to websites and services that are owned or operated by third parties (each, a "Third-party Service"). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner's or operator's privacy policy. We're not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.

What Personal Data do we collect?

The types of Personal Data we collect are described below.

Demographic Data

We collect demographic information, such as your name, email address, physical address, phone number, birthdate, gender, and ethnicity. Primarily, the collection of Your Personal Data assists us in creating Your User Account, which You can use to securely to manage Your healthcare information. We will also use Personal Data to provide you with the Services.

Payment Data

We will also require that you provide to Us your financial and billing information, such as billing name and address, credit card number or bank account information in order to process payments with our third party payment vendor.

Support Data

If You contact DynaBliss for support or to lodge a complaint, We may collect technical or other information from you through log files and other technologies, some of which may qualify as Personal Data. (e.g., IP address). Such information will be used for the purposes of troubleshooting, customer support, software updates, and improvement of the Application and related services in accordance with this Privacy Policy. Calls with DynaBliss may be recorded or monitored for training, quality assurance, customer service, and reference purposes.

Device, Telephone, and ISP Data

We use common information-gathering tools, such as log files, cookies, web beacons, and similar technologies to automatically collect information, which may contain Personal Data, from Your computer or mobile device as you navigate our Applications. The information We collect may include Your Internet Protocol (IP) address (or proxy server), device and application identification numbers, location, browser type, Internet service provider and/or mobile carrier, the pages and files you viewed, Your searches, Your operating system and system configuration information, and date/time stamps associated with Your usage. This information is used to analyze overall trends, to help Us provide and improve our Applications and to guarantee their security and continued proper functioning.

Health Data

If you are a patient, then in addition to demographic information, We will collect information regarding your health conditions, medications, medical appointments, insurance provider, communications between you and your healthcare provider, and any other healthcare information you may self-report through the Applications. We collect this information to help users store and manage information regarding their health.

How will We use Your Personal Data?

We process Your Personal Data for purposes based on legitimate business interests, providing you with the Services through the Application, meeting Our contractual obligations to You, complying with Our legal obligations, and/or Your consent. We only use or disclose Your Personal Data when it is legally mandated or where it is necessary to fulfill the purposes described herein. Where required by law, We will ask for Your prior consent before doing so.

Specifically, we process Your Personal Data for the following legitimate business purposes:

- To fulfill our obligations to You under the Terms and Conditions or another applicable services agreement



- To communicate with You about and manage Your User Account
- To properly store and track Your data within our system
- To respond to lawful requests from public and government authorities, and to comply with applicable state/federal law, including cooperation with judicial proceedings or court orders
- To protect our rights, privacy, safety or property, and/or that of you or others by providing proper notices, pursuing available legal remedies, and acting to limit Our damages
- To handle technical support and other requests from You, including utilizing a HIPAA-compliant remote support software (such as Zoom) to remotely access your computer or other device in order to provide you with support and maintenance services
- To enforce and ensure your compliance with our Terms and Conditions or the terms of any other applicable services agreement We have with You
- To manage and improve our operations and the Applications, including the development of additional functionality
- To manage payment processing
- To evaluate the quality of service You receive, identify usage trends, and thereby improve Your user experience
- To keep our Applications safe and secure for You and for Us
- To send You product, service and new feature information and/or information about changes to our terms, conditions, and policies (with your consent, if required by law)
- To allow us to pursue available remedies or limit the damages that we may sustain
- If you are a patient, to provide access to a third party user (with your consent), to enable that individual to monitor your progress and overall condition and to follow up with you, as they deem appropriate (e.g., you can give access to your caregiver, parent, child, or spouse).

Where is your Personal Data processed?

Personal Data DynaBliss collects through the Applications will be stored on secure servers in the United States, even if you are accessing the Applications from outside the United States. Your country's data protection laws may not apply, and may be more stringent than those to which DynaBliss is legally subject. DynaBliss may transmit Personal Data to third parties, which parties may store or maintain the data on their secure servers. These third parties are not permitted to transfer your Personal Data outside of the United States.

Will We share your Personal Data with anyone else?

If you are a patient user, Yes, with your healthcare provider

If you are a patient user of the Applications, We will share your Personal data with your healthcare provider in order to provide your healthcare provider with the ability to manage your healthcare experience, including for scheduling appointments, tracking your healthcare progress, accessing your insurance information, providing you with invoices, and communicating with you.

Yes, with third parties that help us power our Application

DynaBliss has a limited number of service providers and other third parties ("Business Partners") that help us run various aspects of our business. These Business Partners are contractually bound to protect Your Personal Data and to use it only for the limited purpose(s) for which it is shared. Business Partners' use of Personal Data may include, but is not limited to, the provision of services such as data hosting, IT services, customer service, and billing management.

Yes, with third parties and the government when legal or enforcement issues arise

We may share your Personal Data, if reasonable and necessary, to (i) comply with legal processes or enforceable governmental requests, or as otherwise required by law; (ii) cooperate with third parties in investigating acts in violation of this Agreement; or (iii) bring legal action against someone who may be violating the Terms and Conditions or who may be causing intentional or unintentional injury or interference to the rights or property of DynaBliss or any third party, including other users.

Yes, with third parties that provide advisory services

We may share Your Personal Data with Our lawyers, auditors, accountants, or banks, when We have a legitimate business interest in doing so.



Yes, with third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of DynaBliss's corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings)

If We share Your Personal Data with a third party other than as provided above, You will be notified at the time of data collection or transfer, and You will have the option of not permitting the transfer.

How long do We retain Personal Data?

We store your Personal Data for as long as you maintain a User Account and in accordance with service agreements with our health service provider customers. We will maintain your Personal Data only for as long as we have a valid business purpose and in accordance with applicable law. We may retain archived information for a period of five years (or longer if required by law) as necessary to comply with legal obligations, resolve disputes and enforce our agreements and other authorized uses under this Privacy Policy. At the end of the applicable retention period, We will remove your Personal Data from our databases and will request that our Business Partners remove your Personal Data from their databases. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing of such data.

You may not be able to access, update, or delete information that You share with another party, including your health service provider, through the Applications. Others may also submit personal information that identifies you (for example, when submitting medical family history). You will also not be able to access, update, or delete that information. Certain users, such as health service providers, may be required under HIPAA and other applicable laws to retain information about patients for extended periods of time. We will continue to retain such information on their behalf.

We indefinitely store non-personal information, anonymized data, as well as any feedback you provide us.

NOTE: Once we disclose your Personal Data to third parties, we may not be able to access that Personal Data any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. Written requests for deletion of Personal Data other than as described should be directed to privacy@dynabliss.com.

What is Our Cookie Policy ?

Cookies are small files that a web server sends to your computer or device when you visit a web site that uses cookies to keep track of your activity on that site. They hold a small amount of data specific to that website, which can later be used to help remember information you enter into the site (like your email or other contact info), preferences selected, and movement within the site. If you return to the previously visited web site (and your browser has cookies enabled), the web browser sends the small file to the web server, which tells it what activity you engaged in the last time you used the site, and the server can use the cookie to do things like expedite logging in and retrieving user data and keeping your browser session secure.

We use cookies and other technologies to, among other things, better serve you with more tailored information, and to facilitate efficient and secure access to the Applications. We use two types of cookies: essential and non-essential cookies. Essential cookies are those necessary for use to provide services to you. All other cookies are non-essential. We use two types of non-essential cookies: (1) cookies used to analyze your behavior on a website ("Analytics Cookies"); and (2) cookies used to provide you enhanced functionality ("Functional cookies"). We have provided, below, a full list of our cookies, categorized as described above. We have described the purpose of each, whether they are DynaBliss or Third Party cookies, and how to withdraw consent to their use. We have also indicated which cookies are "session cookies" (which last for as long as you keep your browser open) and "persistent cookies" (which remain on your hard drive until you delete them or they expire).

We may also collect information using pixel tags, web beacons, clear GIFs or other similar technologies. These may be used in connection with some Site pages and HTML formatted email messages to, among other things, track the actions of Site users and email recipients, and compile statistics about Site usage and response rates.

Essential Cookies



Cookie Name, Who Controls It, and Duration	Purpose	Information Collected	How to Withdraw Consent
sessionid DynaBliss 2 weeks	To authenticate you when you sign into the service.	A generated token that allows the server to identify you.	Do not use our Service if you do not want to receive this cookie.
known_user DynaBliss 1 year	To identify your device and warn you about access from unidentified devices.	A generated token that allows the server to identify you.	Do not use our Service if you do not want to receive this cookie.
csrftoken DynaBliss 1 year	To prevent CSRF attacks.	A generated token that helps prevent CSRF attacks on our website.	Do not use our Service if you do not want to receive this cookie.
Stripe cookie Stripe Various	Stripe, our payment card processor, sets various cookies on your browser to identify you to their servers.	Generated cookies uniquely identifying you to Stripe.	Do not use connect your Stripe account with our software if you do not want this cookie.

Analytics Cookies

Cookie Name, Who Controls It, and Duration	Purpose	Information Collected	How to Withdraw Consent
Google Analytics cookie Google 2 years	Web analytics service offered by Google that tracks and reports website traffic. Further information on Google Analytics can be found in this website .	Information will be obtained from the HTTP request of the user, browser/system information, and first-party cookies. Information obtained may include, but not limited to IP address, Date and time of request, Content of the request, Browser information (e.g., screen size, language, version), Operating system information (e.g. version, language)	Click "Decline" button on the cookie banner, use your browser settings to clear any unwanted cookies, or if available, enable "Do Not Track" in your browser settings. Read the section on "Opt Out" of Cookies and Do Not Track (DNT)" in this document for more information.

"Opt Out" of Cookies and Do Not Track (DNT)

If you prevent DynaBliss from collecting any form of cookies, certain features or services of our Application will not work. If you click "Decline" in the cookie banner popup, no tracking and analytic cookies will be placed on your computer. Some browsers allow you to enable a do not track (DNT) signal. If you enable DNT, tracking and analytic cookies will not be placed on your computer by our Application. To find out how to enable this feature on popular browsers:

[Google Chrome](#)

[Microsoft Edge](#)

[Mozilla Firefox](#)



[Opera](#)

You may opt-out from the collection of non-essential device and usage data on your computer by managing your cookies at the individual browser level. Click [here](#) for ways to erase cookies from your computer and to prevent cookies from being created on your browser. Please note, however, that by blocking or deleting cookies and similar technologies used on our websites, You may not be able to take full advantage of the websites.

How do We protect Your Personal Data?

DynaBliss is committed to protecting the security and confidentiality of your Personal Data. We use a combination of reasonable physical, technical, and administrative security controls to maintain the security and integrity of your Personal Data, to protect against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to or use of such information in our possession or control that could result in substantial harm or inconvenience to you. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure. As a result, we cannot ensure the security of information you transmit to us. By using the Applications, you are assuming this risk.

Safeguards

The information collected by DynaBliss and stored on secure servers, is protected by a combination of technical, administrative, and physical security safeguards, such as authentication, encryption, backups, and access controls. At rest, DynaBliss encrypts the entire database. In transit, We force connections over HTTPS. We use a multi-tenant database system with separate schema for each client database to prevent commingling of client data. If DynaBliss learns of a security concern, we may attempt to notify you and provide information on protective steps, if available, through the email address that you have provided to us or by an in-app notification. Depending on where you live, you may have a legal right to receive such notices in writing.

You are solely responsible for protecting information entered or generated via the Applications that is stored on Your device and/or removable device storage. DynaBliss has no access to or control over Your device's security settings, and it is up to You to implement any device level security features and protections You feel are appropriate (e.g., password protection, encryption, remote wipe capability, etc.). We recommend that You take any and all appropriate steps to secure any device that You use to access Our Application.

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NOTWITHSTANDING ANY OF THE STEPS TAKEN BY US, IT IS NOT POSSIBLE TO GUARANTEE THE SECURITY OR INTEGRITY OF DATA TRANSMITTED OVER THE INTERNET. THERE IS NO GUARANTEE THAT YOUR PERSONAL DATA WILL NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR PHYSICAL, TECHNICAL, OR ADMINISTRATIVE SAFEGUARDS. THEREFORE, WE DO NOT AND CANNOT ENSURE OR WARRANT THE SECURITY OR INTEGRITY OF ANY PERSONAL DATA YOU TRANSMIT TO US AND YOU TRANSMIT SUCH PERSONAL DATA AT YOUR OWN RISK.

How can You Protect Your Personal Data?

In addition to securing your device, as discussed above, We will NEVER send you an email requesting confidential information such as account numbers, usernames, passwords, or social security numbers, and You should NEVER respond to any email requesting such information. If You receive such an email purportedly from DynaBliss, DO NOT RESPOND to the email and DO NOT click on any links and/or open any attachments in the email, and notify DynaBliss support at privacy@dynabliss.com.

You are responsible for taking reasonable precautions to protect Your user ID, password, and other User Account information from disclosure to third parties, and You are not permitted to circumvent the use of required encryption technologies. You should immediately notify DynaBliss at privacy@dynabliss.com or 2226 MacArthur Blvd, #27505, Oakland, California 94602, if You know of or suspect any unauthorized use or disclosure of Your user ID, password, and/or other User Account information, or any other security concern.



If You are an EU Data Citizen Your rights are as follows:

If You are an EU Data Citizen, You have certain rights relating to your Personal Data, subject to local data protection laws. These rights may include:

- to access your Personal Data held by us
- to erase/delete your Personal Data, to the extent permitted by applicable data protection laws
- to receive communications related to the processing of your personal data that are concise, transparent, intelligible and easily accessible;
- to restrict the processing of your Personal Data to the extent permitted by law (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your Personal Data, including the right to object to marketing;
- to request that your Personal Data be transferred to a third party, if possible;
- to receive your Personal Data in a structured, commonly used and machine-readable format
- to lodge a complaint with a supervisory authority
- to rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete
- to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"); and

Where the processing of Your Personal Data by DynaBliss is based on consent, You have the right to withdraw that consent without detriment at any time by sending us an email at privacy@dynabliss.com.

You can exercise the rights listed above at any time by contacting us at privacy@dynabliss.com or BY calling 877-396-2254.

How do You update, correct, or delete Personal Data?

You can change your email address and other contact information by sending us an email at info@dynabliss.com. If you need to make changes or corrections to other information, you may send us an email at info@dynabliss.com. Please note that in order to comply with certain requests to limit use of Your Personal Data, we may need to terminate your account and Your ability to access and use the Services, and You agree that We will not be liable to you for such termination or for any refunds of prepaid fees paid by You. You can deactivate your account by sending us an email at info@dynabliss.com.

Although We will use reasonable efforts to do so, You understand that it may not be technologically possible to remove from our systems every record of your Personal Data. The need to back up our systems to protect information from inadvertent loss means that a copy of your Personal Data may exist in a non-erasable form that will be difficult or impossible for us to locate or remove.

Can You "OPT OUT" of receiving communications from Us?

We pledge not to market third party services to you without your consent. We only send emails to you regarding your DynaBliss account and services unless we have your express consent to do so. You can choose to filter these emails using your email client settings, but we do not provide an option for you to opt out of these emails. You can opt out of daily emails by sending us an email at info@dynabliss.com.

Information submission by minors

We do not knowingly collect Personal Data from individuals under the age of 18 and the Applications are not directed to individuals under the age of 13. We request that these individuals not provide Personal Data to Us. If we learn that Personal Data from users less than 18 years of age has been collected, We will deactivate the account and take reasonable measures to promptly delete such data from Our records. If You are aware of a user under the age of 13 using the Applications, please contact us at info@dynabliss.com. Without limiting the foregoing, the Applications do allow persons above the age of 18 years—such as health service providers, parents and guardians—to provide, share and store Personal Data about others, including minors and children. Any user providing, storing or submitting information on behalf of a child assumes full responsibility over the submission, use, and transmission of such information.

If you are a resident of California, under the age of 18 and have registered for an account with us, you may ask us to remove content or information that you have posted to our Applications.



California Residents

California residents may request and obtain from us, once a year, free of charge, a list of third parties, if any, to which we disclosed their Personal Data for direct marketing purposes during the preceding calendar year and the categories of Personal Data shared with those third parties. If you are a California resident and wish to obtain that information, please submit your request by sending us an email at privacy@dynabliss.com with "California Privacy Rights" in the subject line.

Contact Us

If you have any questions about this Privacy Policy, please contact us by email at privacy@dynabliss.com or please write to: 2226 MacArthur Blvd, #27505, Oakland, California 94602. Please note that email communications are not always secure; so please do not include sensitive information in your emails to us.