

# Privacy Policy of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com)

Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) collects some Personal Data from its Users.

## Owner and Data Controller

eSteps Inc. 90 Broad St, New York, NY 10004, US

**Owner contact email:** [hello@estepshealth.com](mailto:hello@estepshealth.com)

## Types of Data collected

Among the types of Personal Data that Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) collects, by itself or through third parties, there are: Trackers; Usage Data; number of Users; session statistics; email address; various types of Data; payment info; first name; last name; phone number; device information; contact details; data relating to the point of sale.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

Unless specified otherwise, all Data requested by Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) is mandatory and failure to provide this Data may make it impossible for Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to provide its services. In cases where Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) or by the owners of third-party services used by Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent

activity, as well as the following: Analytics, Interaction with live chat platforms, Advertising, Displaying content from external platforms, User database management, Contacting the User, Heat mapping and session recording, Interaction with online survey platforms, Interaction with data collection platforms and other third parties, Managing data collection and online surveys, Hosting and backend infrastructure, Access to third-party accounts, Tag management, Interaction with external social networks and platforms and Handling payments.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

## **Facebook permissions asked by Website: [www.eStepsHealth.com](http://www.eStepsHealth.com)**

Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).

The permissions asked are the following:

### **Basic information**

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

### **device information**

#### **Email**

Provides access to the User's primary email address.

#### **Trackers**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

#### **Usage Data**

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Access to third-party accounts**

This type of service allows Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

#### **Facebook account access (Meta Platforms, Inc.)**

This service allows Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to connect with the User's account on the Facebook social network, provided by Meta Platforms, Inc.

Permissions asked: device information; Email; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Website: [www.eStepsHealth.com](http://www.eStepsHealth.com). For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

### **Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com). The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Hotjar Form Analysis and Conversion Funnels (Hotjar Ltd.)**

Hotjar is an analytics service provided by Hotjar Ltd. Hotjar honors generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### **Google Analytics 4 (Google LLC)**

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#); Ireland – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Meta Events Manager (Meta Platforms, Inc.)**

Meta Events Manager is an analytics service provided by Meta Platforms, Inc. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Contacting the User**

### **Contact form (Website: [www.eStepsHealth.com](http://www.eStepsHealth.com))**

By filling in the contact form with their Data, the User authorizes Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; Usage Data.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

### **Mailing list or newsletter**

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Website: [www.eStepsHealth.com](http://www.eStepsHealth.com). Your email address might also be added to this list as a result of signing up to Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) or after making a purchase.

Personal Data processed: email address; Trackers; Usage Data.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

### **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **Google Fonts (Google LLC)**

Google Fonts is a typeface visualization service provided by Google LLC that allows Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

#### **OpenStreetMap widget (OpenStreetMap Foundation )**

OpenStreetMap widget is a maps visualization service provided by OpenStreetMap Foundation that allows Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United Kingdom – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Handling payments**

Unless otherwise specified, Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

#### **Apple Pay (Apple Inc.)**

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: payment info; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

## **Klarna (Klarna AB)**

Klarna is a payment service provided by Klarna AB.

Personal Data processed: payment info; Trackers; Usage Data.

Place of processing: Sweden – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

## **Google Pay (Google LLC)**

Google Pay is a payment service provided by Google LLC, which allows users to make online payments using their Google credentials.

Personal Data processed: email address; first name; last name; payment info; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

## **PayPal (PayPal Inc.)**

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: email address; payment info; Trackers; Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

## **PayPal Carrier Payments (PayPal Inc.)**

PayPal Carrier Payments is a payment service provided by PayPal, Inc., which allows Users to make online payments using their mobile phone operator.

Personal Data processed: device information; payment info; phone number; Trackers; Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

## **Satispay (Satispay Europe S.A.)**

Satispay is a payment service provided by Satispay Europe S.A. which allows Users to make online payments.

Personal Data processed: contact details; first name; last name; Trackers; Usage Data.

Place of processing: Luxembourg – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Shop Pay (Shopify Inc.)**

Shop Pay is a payment management and product checkout page service provided by Shopify Inc. which allows Users to make online payments on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

Personal Data processed: data relating to the point of sale; payment info; Trackers; Usage Data.

Place of processing: Canada – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

## **Stripe (Stripe, Inc.)**

Stripe is a payment service provided by Stripe, Inc.

Personal Data processed: email address; first name; last name; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Heat mapping and session recording**

Heat mapping services are used to display the areas of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

## **Hotjar Heat Maps and Recordings (Hotjar Ltd.)**

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to run and be distributed or to provide a ready-made infrastructure to run specific features or parts of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

## **Openshift (Red Hat, Inc.)**

Openshift is a hosting and backend service provided by Red Hat, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers.

## **SiteGround Hosting (SiteGround Hosting Ltd.)**

SiteGround Hosting is a hosting service provided by SiteGround Hosting Ltd.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Interaction with data collection platforms and other third parties**

This type of service allows Users to interact with data collection platforms or other services directly from the pages of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

## **Hotjar Recruit User Testers (Hotjar Ltd.)**

The Hotjar Recruit User Testers widget is a service for interacting with the Hotjar data collection platform provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

The interaction and information obtained through Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) isn't being connected back to the User's profile.

### **Facebook Like button and social widgets (Meta Platforms, Inc.)**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), in order to contact and be contacted by Website: [www.eStepsHealth.com](http://www.eStepsHealth.com)'s support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

### **HubSpot Chat ( HubSpot, Inc.)**

HubSpot Chat is a service for interacting with the HubSpot live chat platform provided by HubSpot, Inc.

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Interaction with online survey platforms**

This type of service allows Users to interact with third-party online survey platforms directly from the pages of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

### **Hotjar Poll & Survey widgets (Hotjar Ltd.)**

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## Managing data collection and online surveys

This type of service allows Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users. The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

### Hotjar surveys (Hotjar Ltd.)

Hotjar surveys is a survey builder and data collection platform provided by Hotjar Ltd. Hotjar surveys may use cookies to track User behavior. Users can Opt-Out of Hotjar surveys cookie tracking by visiting this [opt-out page](#).

Hotjar surveys respects the Do Not Track option available in most modern browsers that, if activated, sends a special signal to stop tracking User activity. Users can find more information on how to enable Do Not Track for each supported browser [here](#).

Personal Data processed: Trackers.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## Tag management

This type of service helps the Owner to manage the tags or scripts needed on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Website: [www.eStepsHealth.com](http://www.eStepsHealth.com). Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

### HubSpot CRM ( HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

# Cookie Policy

Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## Further Information for Users in the European Union

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the “GDPR”), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled “Detailed information on the processing of Personal Data” within this document**.

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users’ consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner’s legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another

controller without any hindrance.

- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Further information for Users in Switzerland**

This section applies to Users in Switzerland, and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy.

Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and further information about Personal Data can be found in **the section titled “Detailed information on the processing of Personal Data” within this document**.

### **The rights of Users according to the Swiss Federal Act on Data Protection**

Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible, providing Users with the information required by law.

## **Further information for Users in Brazil**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the “Lei Geral de Proteção de Dados” (the “LGPD”), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal information” as it is defined in the **LGPD**.

### **The grounds on which we process your personal information**

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

## **Categories of personal information processed**

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

## **Why we process your personal information**

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

## **Your Brazilian privacy rights, how to file a request and our response to your requests**

### **Your Brazilian privacy rights**

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

### **How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

### **How and when we will respond to your request**

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

## Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

## Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: **California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana.**

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

### Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*

### Internet or other electronic network activity information

**Personal Information collected or disclosed:** Trackers, Usage Data, number of Users, session statistics, email address, various types of Data as specified in the privacy policy of the service, various types of Data, Email, device information, first name, last name, phone number, contact details, data relating to the point of sale

**Sensitive Personal Information collected or disclosed** : payment info

### Purposes:

- Analytics
- Interaction with live chat platforms
- Advertising
- Displaying content from external platforms
- User database management
- Contacting the User
- Heat mapping and session recording

- Interaction with online survey platforms
- Interaction with data collection platforms and other third parties
- Managing data collection and online surveys
- Hosting and backend infrastructure
- Access to third-party accounts
- Tag management
- Interaction with external social networks and platforms
- Handling payments

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** : No

**Targeted Advertising:** : No

**Third-parties:** Google LLC, HubSpot, Inc., Meta Platforms, Inc., Hotjar Ltd., SiteGround Hosting Ltd., OpenStreetMap Foundation, Apple Inc., Klarna AB, PayPal Inc., Satispay Europe S.A., Shopify Inc., Stripe, Inc.

**Service providers or contractors:** Website: [www.eStepsHealth.com](http://www.eStepsHealth.com)

## Identifiers

**Personal Information collected or disclosed:** email address, Usage Data, Trackers, various types of Data as specified in the privacy policy of the service, various types of Data, Email, device information, first name, last name, phone number, contact details

**Sensitive Personal Information collected or disclosed** : payment info

**Purposes:**

- Contacting the User
- Heat mapping and session recording
- Interaction with online survey platforms
- Interaction with data collection platforms and other third parties
- Hosting and backend infrastructure
- Access to third-party accounts
- Handling payments

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** : No

**Targeted Advertising:** : No

**Third-parties:** Hotjar Ltd., Red Hat, Inc., SiteGround Hosting Ltd., Meta Platforms, Inc., Google LLC, PayPal Inc., Satispay Europe S.A., Stripe, Inc.

**Service providers or contractors:** Website: [www.eStepsHealth.com](http://www.eStepsHealth.com)

## Commercial information

**Personal Information collected or disclosed:** Trackers, Usage Data, first name, last name, email address, phone number, device information, data relating to the point of sale

**Sensitive Personal Information collected or disclosed** : payment info

**Purposes:**

- Handling payments

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** : No

**Targeted Advertising:** : No

**Third-parties:** Apple Inc., Klarna AB, Google LLC, PayPal Inc., Shopify Inc.

 You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

**To know more about your rights to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.**

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

## What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

For example, you directly provide your Personal Information when you submit requests via any forms on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com). You also provide Personal Information indirectly when you navigate Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) and features thereof.

## Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

### Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have:

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

### Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana you have

- **The right to opt out** of the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer. In Maryland, your Sensitive Personal Information will be collected or processed only if strictly necessary to provide or maintain a specific product or service requested by you.

In Minnesota and Maryland Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

\* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible
- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

## **Additional rights for users residing in Utah and Iowa**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have:

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

## **How to exercise your privacy rights under US state laws**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

## **How to exercise your rights to opt out**

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request in a frictionless manner.

## **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) and any third-party services may collect files that record interaction with Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### **Personal Data (or Data) / Personal Information (or Information)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Sensitive Personal Information**

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

### **Usage Data**

Information collected automatically through Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) (or third-party services employed in Website: [www.eStepsHealth.com](http://www.eStepsHealth.com)), which can include: the IP addresses or domain names of the computers utilized by the Users who use Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com). The Data Controller, unless otherwise specified, is the Owner of Website: [www.eStepsHealth.com](http://www.eStepsHealth.com).

### **Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) (or this Application)**

The means by which the Personal Data of the User is collected and processed.

## **Service**

The service provided by Website: [www.eStepsHealth.com](http://www.eStepsHealth.com) as described in the relative terms (if available) and on this site/application.

## **Sale**

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

## **Sharing**

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

## **Targeted advertising**

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

## **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

## **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

## **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to Website: [www.eStepsHealth.com](http://www.eStepsHealth.com), if not stated otherwise within this document.

Latest update: January 08, 2026