

Xyngular (XMD Wellness) Data Privacy

Privacy Policy and Notice

This Privacy Policy describes how XMD Wellness LLC ("XMD Wellness," "we," "our," or "us") collects, uses, discloses, and protects your personal information when you use our websites, products, or services or otherwise interact with us. When you use our services, we may collect information from you and the devices you use to access our services.

This Privacy Policy is designed to provide transparency regarding our privacy practices and to help you understand how your information is collected, used, shared, and protected. We are committed to handling your personal information responsibly and providing you with ways to contact us if you have questions or concerns.

You may also receive additional privacy notices that apply to specific products, services, or healthcare providers. Those notices should be read together with this Privacy Policy. This Privacy Policy explains:

The Scope of this Policy

This Policy describes the processing of information provided or collected on our sites and applications where this privacy policy is posted. In some instances, we may provide additional data privacy notices specific to certain products, practices, or regions. Those terms should be read in conjunction with this policy.

If you provide information to us on a third-party site or platform, the information you provide may be separately collected by the third-party site or platform. That third-party site or platform's privacy practices will govern the use of your information. Choices you make on that third-party platform will not apply to our use of the information we have collected through our sites, products, or services.

Who We Are

XMD Wellness LLC operates the XMD Wellness website and provides the technology platform, customer support, administrative services, payment coordination, and other non-clinical services that help facilitate access to healthcare services.

Healthcare services are provided exclusively by independent licensed healthcare providers ("Providers") through affiliated medical groups ("Medical Groups") and telehealth partners. Providers exercise independent medical judgment and are solely responsible for evaluating patients, diagnosing medical conditions, prescribing medications when appropriate, and maintaining medical records.

Prescription medications are dispensed by independent licensed pharmacies pursuant to valid prescriptions issued by licensed Providers. Laboratory testing, when applicable, is performed by independent laboratories.

Each of these organizations operates independently and may maintain its own privacy practices and legal obligations regarding the information it collects and processes.

Telehealth Services

XMD Wellness partners with licensed telehealth providers and independent Medical Groups to facilitate access to healthcare services. These organizations operate independently from XMD Wellness and are solely responsible for the healthcare services they provide.

Medical records, diagnoses, prescriptions, treatment plans, provider notes, laboratory results, and other clinical information are maintained by the applicable Provider or Medical Group in accordance with applicable healthcare privacy laws, including HIPAA where applicable.

This Privacy Policy governs the information collected and processed by XMD Wellness in connection with its websites, products, and services. It does not replace or supersede the privacy notices provided by your healthcare provider, Medical Group, pharmacy, laboratory, or other healthcare organization, each of which is responsible for its own privacy practices.

Your Privacy Rights

Depending on where you reside, you may have rights under applicable privacy laws, including the right to:

- Access your personal information.
- Request correction of inaccurate personal information.
- Request deletion of eligible personal information.
- Request a copy of your personal information.
- Opt out of certain processing activities where required by law.
- Appeal the denial of certain privacy requests, where applicable.

You may exercise your applicable privacy rights by contacting us at compliance@xyngular.com. We will not discriminate against you for exercising your privacy rights. In some circumstances, we may be unable to fulfill your request as permitted by applicable law. If that occurs, we will explain the basis for our decision where required.

How We Protect Information

We maintain administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, use, alteration, or disclosure.

While we use commercially reasonable safeguards, no method of transmitting information over the Internet or storing electronic information can be guaranteed to be completely secure.

Information We Collect

We collect information necessary to provide our websites, products, services, and customer support, administer your account, facilitate healthcare-related services, comply with legal obligations, and improve your experience.

- **Account Information**, such as your name, phone number, email address, mailing address, date of birth, preferred language, login credentials, and, where applicable, sponsor or enroller information.
- **Payment Information**, including billing information. Payment card information is processed and stored by PCI-compliant third-party payment processors.
- **Technical Information**, such as your IP address, browser type, operating system, device identifiers, cookies, and website usage information.
- **Communications**, including information you provide through customer support, surveys, feedback, or other communications with us.
- **Healthcare Coordination Information**, including information necessary to coordinate healthcare services with licensed Providers, Medical Groups, pharmacies, laboratories, and telehealth partners.
- **Medical Information**, including diagnoses, prescriptions, treatment plans, laboratory results, provider notes, and other clinical information, is created and maintained by your licensed Provider or Medical Group. XMD Wellness does not provide medical care and does not maintain the official designated medical record.

Administrative and Clinical Information

XMD Wellness collects and processes information necessary to administer your account, coordinate healthcare services, process payments, communicate with you, and facilitate prescription fulfillment. Clinical information, including diagnoses, treatment plans, prescriptions, provider notes, laboratory results, and medical records, is created and maintained by your licensed healthcare Provider or Medical Group in accordance with applicable healthcare laws.

Identity Verification

To protect patients, comply with applicable laws, and prevent fraud, XMD Wellness may collect and verify information necessary to confirm your identity before providing certain services. This may include government-issued identification, date of birth, contact information, or other information reasonably necessary to verify your identity.

How We Share Information

We may disclose your information only as necessary to provide our products and services, facilitate healthcare-related services, operate our business, and comply with applicable legal obligations.

Depending on the services you receive, we may share your information with:

- Licensed telehealth partners
- Independent Medical Groups
- Licensed healthcare Providers
- Licensed pharmacies
- Laboratory service providers
- Payment processors
- Shipping and fulfillment providers
- Cloud hosting providers
- Customer support providers
- Technology vendors
- Analytics providers
- Governmental or regulatory authorities when required by law

We do not sell your personal information for monetary compensation. We also do not share your personal information for cross-context behavioral advertising as defined under applicable state privacy laws.

We may also disclose your information when necessary to:

- Comply with applicable laws and regulations.
- Respond to subpoenas, court orders, or other lawful requests.
- Exercise or defend our legal rights.
- Investigate, prevent, or respond to fraud, security incidents, illegal activities, or threats to the safety of any person or property.
- Facilitate a merger, acquisition, financing, insurance transaction, or sale of all or part of our business.
- Otherwise comply with applicable law.

We may disclose de-identified, anonymized, or aggregated information in accordance with applicable law.

If you post information on public forums, social media pages, or other publicly accessible areas of our websites or services, that information may be visible to others and may be collected or used by third parties. We encourage you to review the privacy policies of any third-party platforms you use.

No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. Text messaging originator opt-in data and consent will not be shared with any third parties.

Automated Processing

We may use automated technologies to assist with administrative functions, including fraud prevention, scheduling, customer support, document processing, payment processing, website security, and service improvement.

These technologies are used solely to support administrative operations. Medical decisions, diagnoses, treatment recommendations, and prescribing decisions are made exclusively by licensed healthcare providers exercising independent medical judgment.

Your Controls and Choices

You can control how and when you want to receive marketing emails from Xyngular (XMD Wellness) by clicking on the “unsubscribe” link located at the bottom of our email communications to you. This will not affect your receipt of administrative emails (for example, emails about your account, transactions, or policy changes) for your registered account.

Our Commitment to Protecting Information Belonging to Children

If we learn that we have collected personal information from a minor, we will promptly take steps to delete such information and terminate the minor’s account.

Cookies and Other Technologies

Cookies are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features. We recommend you keep cookies activated. We have broken up our cookies into categories to help you understand what they do.

- **Essential:** These cookies are required to use our services. For example, they are necessary to access our website and login to your account.
- **Performance:** These cookies track how you interact with our website. For example, these cookies let us know which pages on our website load slowly or are not optimized for mobile use. We use this information to make improvements to our user experience.
- **Functionality:** These cookies track information about you to make using our website easier. For example, we may retain information such as your login status and viewing preferences.
- **Marketing and Analytics:** These cookies help us create targeted advertising experiences on our websites.

You may manage your cookie preferences using our cookie management banner or your browser settings. Please note that disabling certain cookies may affect the functionality of the Services.

International Data Transfers

XMD Wellness operates primarily within the United States. Information collected through the Services is generally processed and stored in the United States but may be accessed, processed, or transferred to service providers located outside the United States where necessary to provide the Services or operate our business.

When personal information is transferred across borders, we take appropriate measures to protect it in accordance with applicable law.

Contacting Supervisory Authorities

If you would like to lodge a complaint against us, you may contact your local privacy regulator.

If you have trouble locating a privacy regulator, please contact our privacy office at compliance@xyngular.com and they will help you contact the appropriate enforcement agency.

How to Contact Us

If you have any questions about how we process your information, you can contact us at:

Privacy Officer

Address: 2000 W Ashton Blvd, Ste

170, Lehi, UT 84048

Phone: 801-756-8808

Email: compliance@xyngular.com

This policy was last updated: November 2025.

Relationship-Specific Details

Employee/Recruit/Prospect/Candidate

Description

Information gathered pursuant to the prospective or current employment relationship with Xyngular Corporation.

Categories of Information

Personal identifiers
Commercial information
Education and work history
Information about marital status, gender, and race

Category of Data Subject

Prospect and current employees.

The Source from which this Information was Collected

This information is provided directly from prospective and current employees.

Purpose of Processing

This information is processed so Xyngular Corporation can determine whether to enter employment relationships with prospective employees and manage current employees.

Legal Basis for Processing

This information is gathered pursuant to a contractual relationship with current and prospective employees.

Automated Processing or Profiling

Does this product/service/process use automated processing: Yes ☒ No ☐

If yes, the general methods and logic used are: Information is automatically processed for managing recruitment and providing documents to state and federal regulatory agencies.

Does the automated processing affect the rights of data subjects? No.

Information Sharing

Categories of Recipients

Description of Commercial or Business Purpose

Is this Information Sold or Shared

Network and cloud infrastructure services
Office and HR software
Regulatory agencies

Benefits, payroll, and HR administration service providers

Xyngular Corporation provides this information to these recipients for regulatory compliance, recruitment management processing, administering employment contracts, and generally managing its HR functions.

☐ Sold ☒ Shared

Sensitive Personal Information

Category of Sensitive Personal Information Collected

Retention Period

Xyngular receives information such as social security number, passport numbers, and drivers licenses from prospective and current employees.

This information is retained throughout the duration of the employment or as otherwise permitted by local and federal HR laws.

Whether Personal Information is Transferred Internationally

Not applicable.

Retention Period

This information is retained throughout the duration of the employment or as otherwise permitted by local and federal HR laws.

Customer

Description

Information gathered when people purchase products from Xyngular Corporation or its Partners.

Categories of Information

Personal identifiers

Commercial information (please note, credit card information is processed by payment processors, not Xyngular Corporation) Audio data (for customer service and addressing concerns about orders)

Category of Data Subjects

Xyngular Corporation's customers provide this information.

The Source from which this Information was Collected

This information is provided directly from customers to Xyngular.

Purpose of Processing

This information is processed to fulfill customers' orders.

Legal Basis for Processing

This information is gathered pursuant to a contractual relationship with current and prospective employees.

Automated Processing or Profiling

Does this product/service/process use automated processing: Yes ☒ No ☐

If yes, the general methods and logic used are: This information is processed automatically from payment processors and shipping logistics for order fulfillment.

Does the automated processing affect the rights of data subjects? No.

Information Sharing**Categories of Recipients****Description of Commercial or Business Purpose****Is this Information Sold or Shared**

Payment processors

Shipping and logistics companies

Cloud infrastructure

Order fulfillment ☐ Sold ☒ Shared

Sensitive Personal Information**Category of Sensitive Personal Information Collected****Retention Period**

Not applicable.

Whether Personal Information is Transferred Internationally

Not applicable.

Retention Period

This information is retained as otherwise permitted or allowed local and federal law.

Partners

Description

Information gathered when people sign up to distribute Xyngular Corporation's products.

Categories of Information

Personal identifiersCommercial information

Category of Data Subjects

Xyngular Corporation's Partners provide this information.

The Source from which this Information was Collected

This information is provided directly by Partners.

Purpose of Processing

This information is processed to fulfill the Partner relationship with Xyngular Corporation.

Legal Basis for Processing

This information is gathered pursuant to a contractual relationship.

Automated Processing or Profiling

Does this product/service/process use automated processing: Yes ☐ No ☒

If yes, the general methods and logic used are:

Does the automated processing affect the rights of data subjects?

Information Sharing

Categories of Recipients**Description of Commercial or Business Purpose****Is this Information Sold or Shared**

Payment processors

Cloud infrastructure

Xyngular Corporation gathers this information to manage and administer its relationships with Partners.

☐ Sold ☒ Shared

Sensitive Personal Information**Category of Sensitive Personal Information Collected****Retention Period**

Not applicable.

Whether Personal Information is Transferred Internationally

Not applicable.

Retention Period

This information is retained throughout the duration of the contractual relationship with Partners and as otherwise permitted or allowed local and federal law.

Web User**Description**

Information gathered when people browse Xyngular Corporation's website.

Categories of Information

Personal identifiers

Internet data

IP address

Category of Data Subjects

Web users provide this information via Xyngular Corporation's website.

The Source from which this Information was Collected

This information is provided directly from web users.

Purpose of Processing

This information is processed to evaluate and operate Xyngular Corporation's website.

Legal Basis for Processing

This information is gathered pursuant to Xyngular Corporation's legitimate business interests.

Automated Processing or Profiling

Does this product/service/process use automated processing: Yes ☐ No ☒

If yes, the general methods and logic used are:

Does the automated processing affect the rights of data subjects?

Information Sharing**Categories of Recipients****Description of Commercial or Business Purpose****Is this Information Sold or Shared**

Cloud and internet infrastructure

Web development service providers

Data analytics providers

Xyngular Corporation gathers this information to manage and administer its relationships with Partners. ☐ Sold ☒ Shared

Sensitive Personal Information**Category of Sensitive Personal Information Collected****Retention Period**

Not applicable.

Whether Personal Information is Transferred Internationally

Not applicable.

Retention Period

This information is retained as permitted or allowed local and federal law.