

BODHIBREATH LLC
WEBSITE PRIVACY POLICY

Effective date: July 26, 2021

1. **INTRODUCTION.** BODHIBREATH LLC, a California limited liability company (“Company”, “We”, or “Us”), respects your privacy and is committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide when you visit the website <https://www.bodhibreath.com/> (the “Site”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- a. On this Site.
- b. In email, text, and other electronic messages between you and this Site.
- c. Through mobile and desktop applications you may download from this Site, which provide dedicated non-browser-based interaction between you and this Site.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using this Site, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

2. CHILDREN UNDER THE AGE OF 18. Our Site is not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on the Site. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Site or on or through any of its features. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at colleen@bodhibreath.com.

3. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT. We collect several types of information from and about users of our Site, including information:

- a. By which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other information the website collects that is defined as personal or personally identifiable information under an applicable law (“**personal information**”);
- b. That is about you but individually does not identify you; and/or

- c. About your internet connection, the equipment you use to access our Site and usage details.

We collect this information:

- a. Directly from you when you provide it to us;
- b. Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies; and
- c. From third parties, for example, our business partners.

4. INFORMATION YOU PROVIDE TO US. The information we collect on or through our Site may include:

- a. Information that you provide by filling in forms on our Site. This includes, but is not limited to, information provided at the time of registering to use our Site or used to request our services. Such information may include medical information we collect solely to ensure your safety while participating in programs offered by us. Any such information shall be used solely in evaluations of the existence and extent of conditions which may preclude you from participating in our programs for medical reasons or which may require customization of you programming you receive from us, and shall not be stored or used in any other way.
- b. When you enter a promotion sponsored by us, or when you report a problem with our Site.
- c. Records and copies of your correspondence (including email addresses), if you contact us.
- d. Your responses to surveys that we might ask you to complete for research purposes.
- e. Your search queries on the Site.

5. INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES. As you navigate through and interact with our Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- a. Details of your visits to our Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site; and
- b. Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- a. Estimate our audience size and usage patterns.
- b. Store information about your preferences, allowing us to customize our Site according to your individual interests.
- c. Speed up your searches.
- d. Recognize you when you return to our Site.

The technologies we use for this automatic data collection may include:

- a. *Cookies* (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.
- b. *Flash Cookies*. Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION.
- c. *Web Beacons*. Pages of our the Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

6. HOW WE USE YOUR INFORMATION. We use information that we collect about you or that you provide to us, including any personal information:

- a. To present our Site and its contents (including, but not limited to, content generated by algorithms We use on the site) to you;
- b. To provide you with information, products, or services that you request from us, as described herein;
- c. To fulfill any other purpose for which you provide it;

- d. To provide you with notices about your account;
- e. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- f. To notify you about changes to our Site or any products or services we offer or provide through it;
- g. To allow you to participate in interactive features on our Site;
- h. In any other way we may describe when you provide the information; or
- i. For any other purpose with your consent.

7. DISCLOSURE OF YOUR INFORMATION. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide, as described in this privacy policy:

- a. To our subsidiaries and affiliates;
- b. To contractors, service providers, and other third parties we use to support or promote our business, including but not limited to Facebook, Google Analytics, and PayPal,;
- c. To a buyer or other successor in the event of a sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Site users is among the assets transferred;
- d. To fulfill the purpose for which you provide it;
- e. For any other purpose disclosed by us when you provide the information; and
- f. With your consent.

We may also disclose your personal information:

- g. To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- h. To enforce or apply our terms of use and other agreements; or
- i. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others.

8. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION. We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

Promotional Offers from the Company. If you do not wish to have your contact information used by the Company to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which we collect your data or sending us an email stating your request to colleen@bodhibreath.com.

9. ACCESSING AND CORRECTING YOUR INFORMATION. You may send us an email at colleen@bodhibreath.com to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

10. YOUR PRIVACY RIGHTS AS A CALIFORNIA RESIDENT. The California Consumer Privacy Act ("CCPA" or "Act") grants residents of the State of California certain privacy rights in their personal information. This Section only applies to visitors and users of our website who are California residents (hereinafter "you" or "consumer"). This Notice does not apply to personal information collected from California-based employees, owners, or contractors.

We may collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("CCPA personal information"). CCPA Personal information does not include:

- a. Publicly available information from government records;
- b. Deidentified or aggregated consumer information; and
- c. Information excluded from the CCPA's scope.

We currently collect, or have collected within the last 12 months, the following categories of CCPA personal information from consumers:

Category	Examples	Collected
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
Personal information categories listed in the California Customer	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank	YES

Records statute (Cal. Civ. Code § 1798.80(e)).	account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
Geolocation data.	Physical location or movements.	NO
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
Professional or employment-related information.	Current or past job history or performance evaluations.	NO
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
Inferences drawn from	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

other personal information.		
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The CCPA provides California residents with the right to request that we disclose:

- a. Categories of any personal information we collected about you;
- b. Specific pieces of personal information we collected about you;
- c. Categories of sources for any personal information we collected about you;
- d. Our business or commercial purpose for collecting that personal information;
- e. Categories of any third parties with whom we shared your personal information;
- f. Categories of any personal information we disclosed about you for a business purpose;
- g. Your right to request that we delete any personal information about you that we collected from you, subject to certain exceptions outlined below; and
- h. our right not to receive discriminatory treatment for the exercise of your privacy rights conferred by CCPA.

By availing yourself to any of the rights afforded in this Privacy Notice you are declaring that you are a California resident.

Requests to Know or Delete CCPA Personal Information

You have the right to request that we disclose to you or delete any CCPA personal information collected from you. To make such a request, please send an email or write us at:

BODHIBREATH LLC
Attn: Colleen Reid
209 Palomar Rd
Ojai, CA 93023
USA
colleen@bodhibreath.com

Once we receive and confirm your request, we will provide you with your CCPA personal information, or delete the information from our records unless an exception applies. The CCPA provides that we are not required to comply with a request to delete personal information if the information is necessary for us to:

- a. Comply with a legal obligation;
- b. Complete the transaction for which the information was collected, provide a good or service you requested, perform a contract with you, to fulfill the terms of a written

warranty or product recall conducted in accordance with federal law, or take actions reasonably anticipated in the context of our ongoing business relationship with you;

- c. Detect security incidents, protect against deceptive, malicious, fraudulent or illegal activity, or to prosecute those responsible for that activity;
- d. Debug products, services or applications to identify and repair errors that impair existing functionality;
- e. Exercise free speech, to ensure the rights of others to exercise their free speech rights, or to exercise another right provided by law;
- f. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 et. seq.);
- g. Enable solely internal uses that are reasonably aligned with consumer expectations based upon your relationship with us; or
- h. Make other internal and lawful uses of the information that are compatible with the context in which you provided the information.

Before we respond to any request involving personal information, the CCPA requires that we confirm the identity of the person making the request, and if the request is made on behalf of another person, his or her authority to make the request on the other person's behalf. We are not obligated to provide or to delete any information pursuant to your request if we are unable to adequately verify your identity or the identity of the person making the request on your behalf. Accordingly, we reserve the right to deny any request where we are unable to satisfactorily confirm your identity. If you have authorized someone to make a request on your behalf, we reserve the right to deny the request if we are unable to adequately verify the identity of that person or if we are unable to verify that the individual making the request is authorized to act on your behalf.

Limitations on Disclosures of CCPA Personal Information

We are not obligated under the CCPA to respond to any request where compliance or disclosure would violate an evidentiary privilege under California law, or conflict with federal or state law. The CCPA does not require that we provide personal information to a consumer more than twice in a twelve-month period; any disclosures we make will only cover the twelve (12) month period preceding the request.

We will not charge a fee to process or respond to your request and will provide information free of charge. Where a person's requests are repetitive, manifestly unfounded or excessive, the CCPA authorizes us to either charge a reasonable fee that takes into account our administrative costs or refuse to act on the request and notify the person making the request our reason for refusing the request. If we determine that a request warrants a fee, we will explain our decision and will provide you with a cost estimate.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. This means, for instance, that we will not deny you services, charge you a different price, including a discount or other benefit or impose a penalty for the exercise of your CCPA rights.

11. YOUR PRIVACY RIGHTS AS A VISITOR FROM OUTSIDE THE UNITED

STATES. If you are visiting our website from outside the United States, any information you voluntarily provide via our website and any technical information from your browser will be transferred out of your country and into the U.S. The laws and protections available to the privacy of your personal information in the U.S. may significantly differ from the protections available in your country. Personal data transferred to the U.S. may be subject to lawful access requests by state and federal authorities in the U.S. If you do not want any personal information to be transferred to the U.S., please do not provide that information to us via our website.

Visitors from the European Union

For purposes of the General Data Protection Regulation (“GDPR”), we are the data controller for any personal information provided via our website. We do not have a data protection officer in the EU. Any information that you provide to us will be stored in the United States; we do not intend to transfer your personal data to another country or international organization. We will retain any personal information that you provide via our website for seven (7) years from the date you provided or last updated that information, unless you request that information be deleted at an earlier date.

To exercise any of the rights granted to natural persons by the GDPR involving the privacy of their information, please send an email or write us at:

BODHIBREATH LLC
Attn: Colleen Reid
209 Palomar Rd
Ojai, CA 93023
USA
colleen@bodhibreath.com

We will review any requests we receive and will endeavor to respond in a timely manner. For security reasons, we may request specific information from you to help us confirm your identity before taking action on any request, and to ensure your right of access and the exercise any of GDPR right does not adversely affect the rights of others.

We reserve the right to refuse to act on a request, or to charge a reasonable administrative fee when a request is either manifestly unfounded or excessive because of its repetitive character.

12. DATA SECURITY. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or

where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

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

13. CHANGES TO OUR PRIVACY POLICY. It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account or through a notice on the Site home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this privacy policy to check for any changes.

14. CONTACT INFORMATION. To ask questions or comment about this privacy policy and our privacy practices, contact us at:

BODHIBREATH LLC
Attn: Colleen Reid
209 Palomar Rd
Ojai, CA 93023
colleen@bodhibreath.com