

# Consumer Privacy Policy

## Metodica Med Spa Privacy Policy

This policy outlines the data and privacy procedures for data gathered and handled by Metodica Management Inc (referred to as “Metodica Med Spa,” “we,” “us,” or “our”) via Mymetodica.com and any other website, product, feature, or service we provide that displays or shares this Policy (together known as the “Services”), as well as by Metodica Med Spa offline, encompassing our physical store locations, which may be integrated with online data.

You agree that your access and use are governed by this Privacy Policy and our [Terms and Conditions](#).

### **1. The types of data we gather, including personal, sensitive, and non-personal information, and our utilization and sharing practices.**

We gather information about users of the Services directly, automatically during your visit to the Services, and occasionally from third parties. Some of this information might fall under the categories of "personal information" or "personal data," while some may be classified as "sensitive" according to various relevant laws. Additionally, we will regard other details, like IP addresses and cookie identifiers, as "personal data" when mandated by the law, and we will handle specific personal data as "sensitive data" as required by the law.

It is important to note that we may anonymize or pseudonymize personal data to render it non-personal, for instance, by aggregating it with information about other individuals or converting it into a code, often using a method known as "hash," or by eliminating characteristics that could identify the data as yours. We store and utilize de-identified data without any attempts to re-identify it, except where permitted by the law, such as for assessing the compliance of our de-identification procedures with legal standards. De-identified or pseudonymized data will be treated as non-personal

to the maximum extent the law allows. In cases where non-personal data is combined with personal data, we will consider the merged information as personal data by this Privacy Policy.

## **2. Further information regarding our data practices.**

**a. Device ID/Interaction Information.** Metodica Med Spa and our affiliated business partners (such as third-party service providers, content, advertising, and analytics providers) may utilize different technologies, like cookies and web beacons, to automatically gather data when you engage with the Services. This data collection occurs whenever you access, use, or interact with the Services (“**Device ID/Interaction Information**”). Device ID/Interaction Information may include, but is not limited to:

- Information such as your IP address, mobile device identifier, and other distinct identifiers
- Details about your device, like the device model, operating system version, device date and time, and mobile network information
- Your interactions with the Services, including search terms, visited pages, viewed content, items added to the shopping basket, time of last interaction, duration spent on the Services, and preferences identified through a unique visitor ID.

**Location Data.** In some situations, we might gather accurate location information directly from your device. You may be able to disable location data collection through your device settings. Nevertheless, it's important to know that we could still estimate your general location by utilizing other data sources like your IP address.

### **Device ID/Interaction Information may be collected through the use of the following technologies:**

Cookies and local storage refer to text files inserted into a browser on a device during its use of the Services. Some web browsers and add-ons offer alternative local data storage methods. These technologies are utilized to enhance the security of your

Service usage, analyze traffic patterns, evaluate the effectiveness of customer communications, uphold Service integrity, collect crash analytics and maintenance data, monitor and optimize advertisement performance, and personalize user experiences. They also enable the recognition of returning users. Most browsers allow users to manage cookies and local storage by disabling or clearing them through browser settings. However, disabling cookies may impact the functionality of certain Service features.

Pixel Tags, web beacons, pixel tags, 1x1 GIFs, or clear GIFs are small graphic images or web programming code that may be embedded in our web pages and email communications. We and our third-party providers utilize these technologies for various reasons. These include tracking the number of visitors to our Services, monitoring user navigation patterns, tracking email open rates, and monitoring product views for marketing and targeted advertising purposes. The information gathered through these technologies may encompass details such as the initial date and time of email opening and any links clicked within the email.

Embedded Scripts refer to programming code created to gather information on your interactions with the Services, like the links you click. This code is utilized temporarily by our server, a third-party service provider, or a business partner while you are browsing or engaging with the Services. Once you disconnect from the Services, the code is either deactivated or removed.

Information is gathered through mobile devices and SDKs using embedded scripts and tools within Software Development Kits ("SDKs"). This data collection includes the device's hardware model, operating system, version, unique identification numbers linked to the mobile device (e.g., ID for Advertising on Apple devices - IDFA, and Advertising ID on Android devices), mobile network data, and website user behavior. SDKs are software bundles with various tools to aid in app development and integrating new functionalities, including those focused on data collection from devices.

Session Replay Technology. Metodica Med Spa might utilize session replay technology to capture your engagements with the Services, including the pages you

access, the duration of your visits, and any links clicked or data submitted. This information is utilized for internal business objectives, such as website analytics, enhancing the Services, improving our products and services, and resolving functionality concerns.

**b. Data We Receive or Collect from Third Parties.**

Data Enhancement. Your information may be obtained from external sources, including data aggregators, collaborative marketing partners, third-party websites, service providers, and other business associates. Additionally, we might enrich the data we gather by incorporating external records from third parties, such as public databases, publicly accessible social media profiles, and data enhancement providers. This process enables us to furnish you with requested information or services, customize the content, and present opportunities to acquire products or services that align with your interests and for other relevant purposes. It is important to note that any data collected and retained by third parties is governed solely by the privacy policies of those third parties.

The Refer-A-Friend feature allows you to utilize functions like "send-to-a-friend," "refer a friend," or "wishlist" to share content with a third party via the Services. When using this feature to communicate with a friend, the information provided (such as name and email address) is solely used for facilitating the communication and not for any marketing purposes unless explicit consent is obtained. By sharing others' personal data, you confirm that you have the necessary authorization to do so and allow us to handle the data in compliance with the privacy policy.

**c. Data that you directly provide. We might request data from you to utilize while using the Services.**

Engaging in a chat on Metodica Med Spa's platform allows the spa to store, utilize, and keep a record of your interactions and the information you share. This data is used to aid you during the chat, offer customer support, enhance products and services, and for marketing endeavors. If you do not agree to this, kindly refrain from using the chat feature.

Participating in sweepstakes, contests, or promotions may involve registration. By participating in any such activity, you agree to abide by the rules and conditions governing it. These rules may include specific requirements, like allowing the sponsor(s) to use your personal information for marketing purposes, unless prohibited by law. When entering a promotion, your personal data might be shared with third parties or the public for purposes like winner selection or prize distribution, as outlined in the promotion's terms or official rules.

You can upload photos and videos on our platform or submit them for your Metodica Med Spa treatment. The classification of these materials as biometric data may vary based on applicable laws. Metodica Med Spa explicitly states that it does not extract facial geometry data from your visual content or employ them for facial recognition, surveillance, or biometric identification purposes. It's important to understand that if you share your visual content publicly on our platform or we distribute them to third parties in line with our Privacy Policy, these third parties may have different policies regarding the use of your content, and we do not oversee their actions.

**d. Sharing Data with Third Parties.** Non-personal data, like specific Device ID/Interaction Information, aggregated user statistics, and hashed or de-identified data (including email addresses), along with our analyses based on such data, may be shared with third parties for targeted advertising purposes, as permitted by law. It's important to note that we do not oversee the privacy practices of third parties. If you wish to stop receiving communications from a third party or have concerns about their privacy practices, you must contact them directly. The data collected about you, including personal data, may be shared in the situations outlined in this Privacy Policy, as indicated when providing data, or with your explicit consent.

**Social Media and Third-Party Platforms.** We might provide a platform for engaging with social media or other third-party platforms such as Facebook, YouTube, Pinterest, TikTok, or Snapchat. You may be able to log in or link your account with these third-party platforms. By interacting with these platforms through our services, we will obtain information about you from the third-party platform, and you will be

opting to disclose data about your engagements with Metodica Med Spa to that specific social media service.

Furthermore, the third-party platform service might establish its own cookies and gather information regarding your utilization of the Services, such as your IP address or other device identifiers and the specific pages you access on the Services. These third-party platforms could potentially gather specific details about your interactions with the Services, irrespective of whether you actively engage with the feature or possess an account with the third-party platform. When you are not logged in or lack an account, and you visit a page with a social plug-in, your browser transmits a more restricted dataset. Analogous to other websites, the third-party platform will obtain information about the webpage you are browsing, the timestamp of your visit, and additional browser-related details. They may utilize this information to enhance their products or for other purposes outlined in their privacy policy. Additionally, we might receive information about you if other social media users grant us access to their profiles and you are listed as one of their connections or "friends."

The information we gather is governed by this Privacy Policy. Data obtained and stored by a third party is still subject to that third party's privacy practices, including whether they continue sharing data with us, the kinds of data shared, and your options regarding visibility on their platform. The third party might offer the option to uninstall an app or feature, halting further data collection, although previously collected data may be retained.

Should you decide to share information on a third-party platform, it could become publicly accessible.

During a business transition, Metodica Med Spa may disclose and transfer all personal data related to the Services to a subsequent owner, co-owner, or operator of the Services or in connection with corporate activities like mergers, consolidations, bankruptcies, or sales of ownership interests or assets. By providing your data, you acknowledge and consent to the potential transfer of such data to the acquiring entity without additional consent unless mandated by law.

For Administrative and Legal Purposes, Metodica Med Spa retains the right to utilize or reveal any information as necessary to comply with any law, regulation, or legal demand; to safeguard the integrity of the Services; to meet your requirements; to collaborate in any law enforcement inquiry, a public safety issue, or an investigation into allegations of intellectual property violation; to safeguard and uphold the legal rights or assets of Metodica Med Spa, our partners, and shareholders, any Services or its users, or any other entity; or, in an urgent situation, to ensure the health and safety of our users or the general public. This may involve sharing information with other firms and organizations to prevent fraud and reduce credit risks.

### **3. Third-party advertising, analytics, and privacy controls.**

Our utilization of third-party business collaborators, like analytics firms, advertising agencies, network advertisers, and others, involves them providing us with information regarding the Services, users, and our ads. They are responsible for delivering advertisements to you on our behalf, both on the Services and other online platforms. We, along with our third-party business partners, gather specific data about your interactions with the Services and other websites and platforms, including through Social Media Features. This data may be utilized for targeted advertising towards you and others and to evaluate the efficiency of our advertising efforts. Additionally, we may share (or authorize third parties to collect) certain information, such as Device ID/Interaction Information, aggregated or de-identified data, and pseudonymized or hashed data (including email addresses), with these third parties for similar objectives.

These external entities might establish and utilize their tracking mechanisms on your device (such as cookies, web beacons, or similar technologies) and potentially gather or access your personal information over time. This may include details about your interactions with the Services and other online platforms, some of which could be classified as personal data according to different state regulations. The companies we collaborate with, like advertising agencies and networks, may leverage this data, often in conjunction with their own information, to deliver more tailored ads that

align with your interests. This collaborative effort assists us and other parties in achieving the same goal.

- **Cookie Opt-Out Tools.** To stop the sharing of cookies placed on our website by third parties for advertising and analytics, modify your settings by clicking on the appropriate option. [Cookie Preference Center](#). Specific regions offer additional rights to their inhabitants. Kindly refer to [the U.S. State Specific Rights](#) below regarding your additional rights.

- **NAI/DAA Opt-Out.** Certain companies we utilize might belong to the Network Advertising Initiative ("NAI") or Digital Advertising Alliance ("DAA"). The NAI offers details on targeted advertising practices and the [opt-out procedures of NAI members](#). This encompasses choices to decline for web browsers, smartphones, and other linked devices, along with functionality to opt-out from NAI members' involvement in interest-based advertising through your encrypted email address. You may also want to visit the [DAA's website](#), which provides information regarding targeted advertising and offers an opt-out for DAA-participating companies.

- **Mobile Device/AppChoices.** Mobile devices often feature options that enable users to deactivate tracking for advertising and/or analytics. Moreover, the digital advertising sector allows mobile users to sign up for such services. [AppChoices](#) for their preference to avoid receiving personalized advertisements.

- **Google Analytics.** Our utilization of Google Analytics involves the use of cookies and comparable technologies to gather and assess data regarding the utilization of the Services, providing reports on activities and trends. Additionally, this service might gather information on using alternative websites, applications, and online services. You can [learn about Google's practices](#) and opt out of them by downloading the [Google Analytics opt-out browser add-on](#).

Please be aware that utilizing these methods to opt-out does not exempt you from targeted advertising, and you will still receive generic ads during your online activities. Your choices to opt out are specific to each browser and device. If you

disable cookies, update your browser after opting out, or use various devices, please ensure that you opt out separately on each browser and device.

#### **4. Disclosures for Loyalty Programs**

Our Loyalty Program offers benefits like earning points on qualifying purchases that can be exchanged for credit. Please note that this program may be discontinued at any time, solely at our discretion.

Within our Loyalty Program, we handle various data types, including email addresses, phone numbers, login details, and member ID numbers. It's important to note that we do not sell or process this data for targeted advertising objectives. For details on managing other data categories, please refer to the "Personal, Sensitive, and Non-Personal Data We Collect and How We Use and Disclose It" section in our Privacy Policy.

The consequences of deleting personal data for Loyalty Program members who opt to exercise their right include the removal of their account, unique membership ID, accrued points, contact details, and any other account-related information. Following the deletion, no benefits from the Loyalty Program will be accessible to the individual.

Our system uses a points-based structure linked to your individual membership ID, reflecting your purchases. Points are deducted when you redeem or return items. If we can't link your transactions to your membership ID, which will be deleted upon your request, we won't be able to adjust points based on your activity or access any previously earned points.

If your distinct membership ID is removed from our databases, we won't be able to identify it to grant you access to exclusive member benefits that we occasionally provide. Should you decide to enforce your data privacy rights, affecting your participation in the Loyalty Program, we will inform you about the implications of your choice before terminating your membership or benefits. This notification will be sent to the contact details you have shared with us.

## 5. The options available to you

**Marketing Messages from Us.** We might offer you the choice to update your details or unsubscribe from marketing messages via your account's profile and/or preferences area. Furthermore, you can opt out of marketing communications as described below.

- **Email.** If you wish to stop receiving marketing emails from us, you can opt-out using the mechanism provided in each email. Please be aware that we may still send you essential communications regarding using our Services, notifications about updates to our Privacy Policy or terms, or other necessary administrative and transactional messages.
- **Text Messages.** If you opt-in to receive SMS, MMS, or RCS messages from Metodica Med Spa, you can opt-out by replying with "STOP" to the designated short code.
- **Push Notifications.** Promotional and non-promotional push notifications or alerts may be sent to your mobile device, sometimes based on location or proximity to a beacon. You can opt out of receiving these messages by adjusting the notification settings on your mobile device at any time.

### **Options for Data Privacy.**

- **Access, Correction and Deletion.** You are responsible for ensuring the accuracy of the information you share with us, including your contact details. You can update the information you have provided by accessing the "Account" section or a similar page on our platform. Metodica Med Spa will endeavor to implement the requested changes in our active databases promptly and in good faith. Please be aware that some data may still be retained for administrative purposes or on backup systems. If you wish to view, modify, correct, or delete personal data collected by Metodica Med Spa through our platform.

## 6. Security

Metodica Med Spa implements commercially reasonable measures to safeguard your personal data. Nevertheless, no method of data transmission over the Internet, wireless communication, or electronic data storage can be completely secure. Metodica Med Spa cannot guarantee or warrant the security of any collected data. Your use of the Services and provision of data is done at your own risk.

## **7. External Content and Hyperlinks**

Within the Services, there might be content provided by third parties or links to external content or websites. Metodica Med Spa lacks control over such content or websites. These third-party operators and content providers utilize their own tracking technologies, like cookies, and may gather data independently from you. Metodica Med Spa does not take responsibility for the privacy practices of any third party.

## **8. Agree to Transfer**

Metodica Med Spa functions as a business established in the United States. Please be aware that any data collected will be transferred to and managed in the United States and other countries. By engaging with the Services or sharing any information with us, you explicitly recognize and agree to this transfer and the processing, use, sharing, and storage of your data in the United States and other regions. It is crucial to understand that the privacy laws in these areas may not provide the same level of protection as those in your country of origin or residence. Consequently, your data could be subject to access requests from governmental entities, courts, or law enforcement agencies in the United States and other jurisdictions by the laws of those regions. Your data will also be shared with third parties, as outlined in the aforementioned section.

## **9. Services for a wide audience**

The services cater to a broad audience and are not intended for individuals under 18. We do not intentionally gather personal information from minors under 18 years old through online means. If you are a parent or guardian and suspect that we possess information about your child, please contact us.

## **10. Modifications to the Privacy Policy**

Subject to the extent allowed by the law in force, we hold the right to modify or alter this Privacy Policy at our discretion at any given time. Notifying significant changes will be made by publishing the revised Privacy Policy on our Services. Additionally, we may inform you through the contact details you provided. Any alterations will take effect immediately upon the publication of the updated Privacy Policy unless stated otherwise. Your continued use of the Services following the effective date of the revised Privacy Policy (or as specified in the revised Privacy Policy) will signify your agreement to those changes to the maximum extent permitted by law. However, we will inform you and seek your consent (opt-in or opt-out) if mandated by law. Please be aware that agreeing to our new policies may be necessary to maintain access to the Services.

## **11. Ways to Reach Us**

Feel free to reach out to us via email at [office@metodica-cosmetology.com](mailto:office@metodica-cosmetology.com). The details you share will be utilized to address your inquiries or feedback promptly. Your comments may be stored and forwarded to our consumer care department to enhance our services moving forward. Should you have any further inquiries regarding our privacy policy, please don't hesitate to contact us at the following address:

Metodica Med Spa

626 Sheepshead Bay Road, Suite #530, Brooklyn, NY, 11224