

Privacy Policy

Effective Date: September 26, 2025

Version 2.0

Axo Longevity, Inc. ("Axo Longevity," "Axo," "we," "us," "our") respects your privacy and is committed to protecting your personal information. This Privacy Policy explains how we collect, use, and protect your personal information when you use our website, apps, products, and services.

Quick Summary:

- We are a wellness and performance company, not a healthcare provider.
- We collect personal, usage, and (with your explicit consent) biomarker and wearable data to provide and personalise our services.
- We never sell your personal information.
- We comply with the UK GDPR, EU GDPR, and, where applicable, the CCPA/CPRA.
- You have rights to access, correct, delete, and control your data.

Who We Are

Axo Longevity, Inc. provides a high-performance wellness membership featuring biomarker testing, dashboards, AI-assisted coaching, and athlete benchmarking. Our services are for wellness, performance, and educational purposes only and are not intended to diagnose, treat, cure, or prevent any disease.

Data Controller: Axo Longevity, Inc.

Address: 373 Wythe Avenue, Suite 11B, Brooklyn, NY 11249, USA

Email: privacy@axolongevity.com

What Personal Information We Collect

- **Identification & Contact:** Name, email, phone, address, account details.
- **Profile & Lifestyle (optional):** Height, weight, sleep, nutrition, goals.
- **Health & Biomarker Data (with explicit consent):** Lab results, wearable data, physiological markers, AI-generated insights.
- **Device & Usage Data:** IP address, browser type, device information, browsing/app activity.
- **Transaction Data:** Membership, billing, shipping and payment details.
- **Marketing & Communications:** Preferences, survey responses, support communications..
- **Community & User Content:** Posts, ambassador content, challenge submissions.

How We Collect Information

We collect data directly from you (sign-up, purchases, uploads, support), automatically (cookies, analytics), and via partners (labs, wearables, professionals) with your consent.

Legal Bases for Processing (UK/EU)

We process personal data under the following lawful bases:

- **Contract:** to provide and manage your membership and core services.
- **Consent:** for processing health, biomarker, and wearable data, and for marketing communications.
- **Legal Obligation:** to comply with tax, accounting, and regulatory requirements.
- **Legitimate Interests:** to improve and secure our services, analyze usage, and communicate relevant updates (unless overridden by your rights).

We process health-related and biometric data only under Article 9(2)(a) of the GDPR – with your explicit consent, which you may withdraw at any time by contacting privacy@axolongevity.co

How We Use Your Information

- Deliver and manage our core services (biomarker tracking, dashboards, coaching).
- Personalise insights and recommendations.
- Process payments and administer memberships.
- Improve, test, and secure our products and platform.
- Communicate with you (support, service updates, marketing with consent).
- Comply with legal, regulatory or contractual obligations.

How We Share Information

We do not sell personal data. We may share your information only with:

- Accredited labs (for biomarker processing)
- Service providers (e.g. payments, hosting, analytics)
- Professionals or partners you choose to connect with (e.g. medical)
- Affiliates/subsidiaries for internal operations.
- Regulators or authorities where required by law.

All third parties are bound by confidentiality and data protection agreements.

Data Retention

We retain data only as long as necessary for the purposes outlined above or as required by law:

- Account data: for the life of your account + up to 5 years.
- Biomarker/health data: for the membership period + up to 5 years (unless withdrawn sooner)
- Transaction data: 7–10 years (for tax/legal compliance).

- Logs and analytics: 12–24 months.
- Anonymized/aggregated data: may be kept indefinitely.

Cookies & Tracking

We use cookies and similar technologies for functionality, analytics, and personalisation. You can manage preferences through your browser, device settings or our Cookie Consent Manager. See our [Cookie Policy](#) for more details

Your Rights

If you are in the EU/EEA/UK, you have the right to access, rectify, erase, restrict, object, port your data, withdraw consent, and lodge a complaint. Contact us at privacy@axolongevity.com to exercise these rights.

California Privacy Rights (if applicable)

While our operations are based in the UK and EU, California residents may have rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA).

If you are a California resident, you may request to:

- Know, access, correct, or delete your personal information
- Opt out of the sale or sharing of your information (we do not sell data)

Submit requests to privacy@axolongevity.com.

California “Do Not Sell or Share” Notice

If applicable, we may use cookies and similar technologies that constitute “selling” or “sharing” under the CCPA/CPRA.

California users can opt out by clicking “**Do Not Sell or Share My Personal Information**” on our website or by using a browser that supports the **Global Privacy Control (GPC)** signal.

International Data Transfers

Your data may be processed in the United States and other countries. We use Standard Contractual Clauses (SCCs) and other safeguards approved under the UK and EU GDPR frameworks. Copies available upon request.

Security

We use technical and organisational safeguards: encryption, access controls, vendor contracts, employee training, and incident response. No system is 100% secure, but we continuously improve protections.

Automated Decision-Making & AI

Our AI Copilot provides wellness insights based on biomarker and wearable data (with your consent). These insights do not constitute medical advice or decisions. We do not engage in solely automated decision-making that produces legal or similarly significant effects.

Children's Privacy

Our services are for adults (18+). We do not knowingly collect data from children. If you believe a child has provided data, contact us immediately.

Sensitive Information

We only process health-related data with your explicit consent and do not collect other sensitive categories (race, religion, political views) unless required by law.

Contact Us & EU/UK Representatives

Data Protection Officer (DPO):

Alonso Mujica – alonso@axolongevity.com

EU Representative:

Osano International Compliance Services Limited

ATTN: 6GEV

25 North Wall Quay, Dublin 1, D01 H104, Ireland

UK Representative:

Osano UK Compliance LTD

ATTN: 6GEV

42-46 Fountain Street, Belfast, Antrim, BT1-5EF, UK

Updates to This Policy

We may update this Privacy Policy from time to time. The latest version will always be posted here with a new "Effective Date." If changes are material, we will provide prominent notice.