

Privacy Policy

WellWell, LLC

Last updated: August 21, 2026

1. Introduction

This Privacy Policy describes how WellWell, LLC (“**WellWell**,” “**we**,” “**us**,” and “**our**”) collects, uses, maintains, protects, and discloses Personal Data about you through the use of the Services. By “**Personal Data**,” we mean information that is personally identifiable to you. For purposes of this Privacy Policy, “**you**” means you on behalf of yourself and any family member or other individual for whom you are legally authorized to act (“**Family Members**”), including your minor children.

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

This Privacy Policy also describes the types of information we may collect from you or that you may provide when you visit or use our website located at <https://www.wellwellskin.com> (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Privacy Policy supplements our Website’s Terms of Service available here: https://cdn.prod.website-files.com/69f9a2ac578f0b43051c3bde/6a7fa8ca8867286a5352a833_3078a588ca5036c1e9fdd65d023cf970_WellWell%20-%20Website%20Terms%20of%20Service.pdf. For purposes of this Privacy Policy, our Website, applications, and all related services and functionality that we provide through them are referred to as our “**Services**.”

2. Protected Health Information

Some of the information we protect, use and disclose about you is your “protected health information” or “PHI” as defined under the Health Insurance Portability and Accountability Act of 1996 and related laws and regulations (“**HIPAA**”). If your Personal Data is PHI, we treat the PHI in accordance with HIPAA and our Notice of Privacy Practices available here: *[insert hyperlink]*. To the extent this Privacy Policy conflicts with our HIPAA obligations or the Notice of Privacy Practices, we comply with HIPAA obligations or the Notice of Privacy Practices.

3. Children's Privacy

*This Section explains our online information collection, disclosure, and parental consent practices with respect to information collected from children under the age of 13 in accordance with the U.S. Children's Online Privacy Protection Act (“**COPPA**”).*

For more information about COPPA and general tips about protecting children's online privacy, please go to <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>. No Personal Data about a child under the age of 13 will be made available to the public or sold. We may share information with our service providers if necessary for them to perform business, professional, or technology services for us, always in accordance with all applicable laws including HIPAA.

Children under 13

Children under 13 years of age may use the Services, but are not eligible at this time to self-register for the Services without their parent or legal guardian. If you prefer for your child not to directly interact with WellWell, please do not provide account credentials to your child. If you register as the parent or legal guardian on behalf of a minor child under 13 years of age, you understand that as part of the Services, we will collect the Personal Data of the child in accordance with this Privacy Policy. Your consent is required for the collection, use, and disclosure of the child's information. We will not collect your child's Personal Data unless we have first obtained your verifiable parental consent through one of the methods permitted by COPPA. You may refuse to permit any further collection or use of your child's Personal Data and may direct us to delete it at any time by contacting us at the address in the Contact Information section. If you do not provide verifiable parental consent, your child under 13 years of age may not use our Services.

If you access or use the Services, you represent and warrant that you are at least 13 years old or you have the authorization of a parent or legal guardian who agrees to be bound by our Terms of Service and this Privacy Policy (and supervises your use of the Services). If you are under 13 and lack sufficient authority to access or use the Services, do not use or provide any information on the Services.

If we learn that we have collected the Personal Data of a child under 13 outside the above circumstances we will take steps to delete the information as soon as possible to the extent permitted by law. If you are a parent or guardian of an individual under the age of 13 and believe your child has disclosed personal or health information to WellWell without your authorization, please contact us at hello@wellwellskin.com.

4. Personal Data We Collect About You

We collect different types of Personal Data about you. This section is intended to describe the Personal Data that we may collect about you.

Information you provide us directly:

- **Contact and appointment requests:** name, email, telephone, preferred location and provider, preferred appointment times, and any information you choose to include in a free-text message field.
- **Consultation and intake forms completed on the Website:** the information requested on those forms, which may include health history, medications, allergies, skin concerns, and

treatment goals. Information you submit through an authenticated patient portal or clinical intake form becomes PHI upon receipt and is governed by our Notice of Privacy Practices.

- **Patient portal registration:** username, password, security questions, and account recovery information.
- **Payment and financing:** payment card or bank account information, billing address, and information you provide to a third-party patient-financing partner.
- **Marketing signups:** email address, mobile number, and stated interests.
- **Photographs and images:** photographs you upload for a virtual consultation or that you authorize us to use.
- **Events, promotions, giveaways, and surveys:** the information requested at the time.

Because of the types of Services we provide, images are central to our care. We may collect:

- Clinical photographs, including “before and after” images, taken in our offices or uploaded by you for a virtual consultation.
- Images produced by skin-analysis, imaging, or treatment-planning systems, including systems that map facial features or measure skin characteristics.

These images are PHI when created or received in connection with your care and PHI is governed by our Notice of Privacy Practices.

Information collected automatically

When you visit the Website, we and our service providers may automatically collect: IP address; browser type, version, and language; operating system and device type; screen resolution; referring and exit URLs; pages and content viewed; date, time, and duration of visits; search terms entered on the Website; and general geographic area inferred from IP address.

The technologies we use for this automatic data collection may include web server logs and server-side tracking tools, software development kits (SDKs), cookies, and similar tracking technologies to operate our Services, analyze usage, improve performance, and support marketing and outreach efforts.

Information from other sources

- Referring physicians and other treating providers;
- Health plans, clearinghouses, and payors;
- Our appointment-scheduling, telehealth, and practice-management vendors;
- Publicly available sources;
- Social media platforms, when you interact with our pages or click our advertisements, in accordance with the platform’s own privacy policy.

5. How We Use Your Personal Data

We use information that we collect about you or you provide to us, including Personal Data, for the business purposes described below:

- provide the Services to you;

- provide you with information, products, or services you request from us or in response to a request;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- provide you with notices about your account in our patient portal;
- provide you with newsletters, advertisements, and other promotional communications (with your consent);
- provide our Website and its functionality, contents, and the Services to you;
- to process, fulfill, support, and administer transactions and orders for products and services ordered by you;
- to fulfill any other purpose for which you provide it;
- to notify you about changes to our Services or any products or services we offer or provide;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

Marketing, Email, Text Messages, and Calls

- **Email.** Every marketing email includes an unsubscribe link. We honor unsubscribe requests within ten (10) business days, as CAN-SPAM requires, and generally much sooner.
- **Text messages.** We send appointment reminders and, separately, promotional text messages only to numbers for which we have obtained the consent the Telephone Consumer Protection Act requires. Reply **STOP** to opt out or **HELP** for assistance. Message and data rates may apply. We do not share mobile telephone numbers or SMS consent with any third party for that party's own marketing purposes, and consent to receive text messages is not a condition of receiving treatment.
- **Telephone calls.** We maintain an internal do-not-call list and honor requests to be added to it.

Opting out of marketing does not stop transactional and clinical messages such as appointment confirmations, test results, billing notices, and recall reminders.

6. How Long We Keep Your Personal Data

We keep Your Personal Data only as long as reasonably necessary for the purposes described in this Policy, and then delete it or deidentify it. We do not retain Personal Data indefinitely. Note that we are obligated to retain PHI according to HIPAA rules.

Children's Data Retention Policy

We are required under COPPA to adhere to the following:

- **Purposes for which we collect children's Personal Data:** scheduling and providing dermatologic care; communicating with the parent or guardian; billing and insurance; and maintaining the legally required medical record; including, through our third-party electronic medical records and billing vendor, Tebra.

- **Business need for retention:** continuity of care; compliance with Georgia medical records law and HIPAA; defense of professional liability claims within the applicable limitations and repose periods.
- **Deletion timeframes:**
 - Online contact information collected solely to seek parental consent, where consent is not obtained: **deleted within 30 days.**
 - Information supporting a one-time response to a child's request: **deleted immediately after the response.**
 - Website inquiry and scheduling data for a child who does not become a patient: **deleted within [twenty-four (24) months].**
 - Persistent identifiers used for internal operations: **deleted or truncated within [fourteen (14) months].**
 - Information in the child's medical record: retained in accordance with HIPAA, then securely destroyed.
- We do not retain children's Personal Data indefinitely, and we do not retain it for any secondary purpose.
- We maintain a written children's information security program that designates Elizabeth Brennan, PA as responsible for it, identifies the internal and external risks to children's information, implements safeguards against those risks, tests them, and is reviewed at least annually.

7. Disclosure of Your Personal Data

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy.

We may disclose Personal Data that we collect or you provide as described in this Privacy Policy, including:

- to service providers and other third parties we use to support our business (the services provided by these organizations include online scheduling, electronic medical records, virtual meeting support, and billing with Tebra, IT and infrastructure support services, and ordering, marketing, and payment processing services with Shopify);
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other 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 Data held by WellWell about the users of the Service are among the assets transferred;
- to fulfill the purpose for which you provide it (for example, we may disclose your Personal Data to a health care provider);
- for any other purpose disclosed by us when you provide the information; and

- to contractors, service providers, and other third parties we use to support our business.

We may also disclose your Personal Data:

- to comply with any court order, law, legal process, or other legal obligations, including to respond to any government or regulatory request;
- to enforce our legal and equitable rights, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of WellWell, our customers, or others (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

In addition, we may disclose aggregated information about how our Services are used and information that does not identify any individual, without restriction.

8. Choices About How We Use and Disclose Your Personal Data

We offer you choices on how you can opt out of our use of tracking technology, disclosure of your Personal Data for our advertising to you, and other targeted advertising.

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Tracking Technologies and Advertising.** You can set your browser or operating system to refuse all or some cookies or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Services may then be inaccessible or not function properly.
- **Promotional Offers from WellWell.** If you do not wish to have your email address used by us to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us or by contacting us. This opt out does not apply to information provided to us as a result of a Service purchase or your use of our Services.
- **Targeted Advertising.** To learn more about interest-based advertisements and your opt-out rights and options, visit the Digital Advertising Alliance and the Network Advertising Initiative websites (www.aboutads.info and www.networkadvertising.org). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the NAI on its website.
- **Text Messages.** If you do not wish to receive informational text messages from us, you can opt out at any time by texting the word STOP in response to any text messages you receive. We may confirm your opt-out by text message.

9. Your Rights Regarding Your Personal Data

You can review and change your Personal Data by logging into the Services and changing your Account information. You may also contact us at hello@wellwellskin.com regarding any of your rights under applicable state laws; any changes or errors in any Personal Data we have about you to ensure that it is complete, accurate, and as current as possible; or to delete your Account. We may not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

See state-specific sections below on your rights under specific state laws.

10. Cookies and Other Tracking Technologies

Cookies

A cookie is a small text file that is placed on your computer or mobile device when you visit a site, that enables us to: (i) recognize your computer/device; (ii) store your preferences and settings; (iii) understand the parts of the Services you have visited and used; (iv), enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform searches and analytics; and (vi) assist with security and administrative functions.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., Microsoft Edge; Google Chrome; Mozilla Firefox; or Apple Safari). Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Services.

Global Privacy Control

Global Privacy Control. We treat a Global Privacy Control (“GPC”) or other recognized universal opt-out signal received from your browser or device as a valid request to opt out of sale/sharing and targeted advertising, and to limit the use of sensitive personal information, for that browser or device. Because the signal is tied to a browser or device, we cannot associate it with your account unless you are logged in.

Do Not Track Signals

We currently do not honor do-not-track signals that may be sent by some browsers.

We also may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. Because there is no standard for these signals at this time, we currently do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such a signal is broadcast or received by us.

11. Data Security

Information transmitted over the Internet is not completely secure, but we do our best to protect your Personal Data. The safety and security of your information also depends on you. Where

you have chosen a password for the use of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. We use encryption technology for information sent and received by us.

Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to the Services. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services or in your operating system.

12. Telehealth and Patient Portal

If you use our telehealth or patient portal services, the information you submit is PHI, is transmitted over an encrypted connection, and is stored by vendors we have engaged under Business Associate Agreements. Communications through the portal are more secure than ordinary email. Please do not send us PHI by unencrypted email or through the Website's general contact form.

13. State Law Rights.

Twenty or more states have comprehensive consumer privacy laws in effect and more will take effect soon. Rather than track shifting residency requirements, we make the following rights available to every U.S. resident, subject to verification and to the exceptions the applicable law allows.

Rights

With respect to your Personal Data, you have the right to:

- **Know / Access.** Confirm whether we process your Personal Data and obtain a copy, together with the categories collected, sources, purposes, categories of third parties to whom we disclose it, and specific pieces of information.
- **Correct.** Correct inaccurate Personal Data, taking into account its nature and our processing purposes.
- **Delete.** Request deletion, subject to our legal data retention obligations.
- **Portability.** Receive a copy in a portable and, to the extent technically feasible, readily usable format.
- **Opt out of sale, sharing/targeted advertising, and certain profiling.** We will honor your opt-out request as soon as we can, but it may take up to ten (10) days.
- **Limit use and disclosure of sensitive Personal Data.** We already limit such use to the purposes permitted by law.
- **Withdraw consent.** Withdraw previously given consent for us to use your Personal Data.
- **Non-discrimination / non-retaliation.** We will not deny services, charge different prices, provide a different level or quality of service, or retaliate against you for exercising any of these rights.

- **Appeal.** Appeal as described below.

How to submit a request

- Email: hello@wellwellskin.com [or other privacy email]
- Mail: Privacy Officer, WellWell, LLC, [insert address]

For PHI, use the medical records request process in our Notice of Privacy Practices.

Verification

We will verify your identity before responding, using information we already hold. For sensitive requests we may require additional verification. We will not require you to create an account to submit a request, and any information you provide for verification is used only for that purpose and then deleted.

Authorized agents

You may use an authorized agent. We may require the agent to provide written permission signed by you and may require you to verify your own identity directly with us, except where the agent holds a valid power of attorney under Georgia law or the law of your state.

Response times and appeals

We will respond within forty-five (45) days, extendable once by an additional forty-five (45) days (ninety (90) days in some states) where reasonably necessary, with notice to you of the extension and the reason.

If we decline your request, you may appeal by writing to hello@wellwellskin.com with the subject line “Privacy Request Appeal.” We will respond in writing within sixty (60) days, or the shorter period your state requires, explaining the reasons for our decision. If we deny the appeal, we will provide you with a method to contact your state Attorney General to submit a complaint.

State Specific Supplements

- **California.** The rights above satisfy the California Consumer Privacy Act as amended by the CPRA. Note that PHI and medical information governed by HIPAA and the Confidentiality of Medical Information Act are exempt from the CCPA. The Rights listed above in this Section apply to your non-exempt information, and your HIPAA rights apply to the rest. California residents may also request the disclosures described in Cal. Civ. Code § 1798.83 (“Shine the Light”). We do not disclose Personal Data to third parties for their own direct marketing purposes.
- **Nevada.** Nevada residents may direct us not to make any sale of certain “covered information,” as defined in Nev. Rev. Stat. § 603A.340. We do not make such sales, but you may submit a verified request to hello@wellwellskin.com.
- **Washington and Nevada - consumer health data.** See our separate Consumer Health Data Privacy Policy at https://cdn.prod.website-files.com/69f9a2ac578f0b43051c3bde/6a7fa94c7f709160fa3b04de_WellWell%20-%20Notice%20of%20Privacy%20Practices%20Website.pdf, which describes the categories of consumer health data collected, the purposes, the categories

of sources and recipients, and how to exercise your rights to access, delete, and withdraw consent. We do not geofence any health care facility, and we do not sell consumer health data. Washington residents are reminded that the My Health My Data Act provides a private right of action.

You may have other rights under the state law applicable to you.

14. International Users

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Any information you provide to us through use of the Services while you are located in another country may be stored and processed, transferred between and accessed from the United States and other countries that may not guarantee the same level of protection of personal data as the one in which you reside.

15. Third-Party Sites and Social Media

The Website may link to third-party websites, review platforms, product manufacturers, and social media pages. We do not control those services, and this Policy does not apply to them. Review their privacy policies before providing information.

If you post about us on a public review site or social media, that post is public. We will not respond publicly in any way that discloses or confirms that you are or were a patient, because doing so would be an impermissible disclosure of PHI. If you would like us to address a concern, please contact us directly.

16. Accessibility

We strive to make this Policy accessible to individuals with disabilities. If you need this Policy in an alternative format, contact us at hello@wellwellskin.com or [*insert phone*].

17. Changes to Our Privacy Policy

We may change this Privacy Policy at any time. If we make material changes to how we treat your Personal Data, we will notify you by email to the email address specified in your account and/or through a notice on the Website's home page and invite you to review (and accept, if necessary) the changes. The date this 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 the Services and reviewing this Privacy Policy to check for any changes.

18. Contact Information

If you have any questions, concerns, complaints, or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at the contact information below.

How to Contact Us:

By email at hello@wellwellskin.com or by secure messaging in your patient portal is likely to have the quickest response.

WellWell, LLC

Attn: Privacy Officer

317 East Broad Street Savannah, Georgia 31401

(912) 542-9215