

## **Privacy Policy**

This Privacy Policy sets forth our policy in relation to personal and other information collected from users and visitors of the this website, mobile application or other website owned or operated by The Refinery Medspa and Wellness, LLC (“The Refinery”), including, but not necessarily limited to [www.refinerymedspa.com](http://www.refinerymedspa.com) (hereafter, the "Site").

We are committed to upholding a high standard in order to protect personal and financial information of our users and keep it safe and confidential. For this purpose, we share you with this Privacy Policy to explain how we collect, use and protect your personal information.

By browsing, accessing and using the Site, you agree to proceed on the basis of this Privacy Policy and you agree with the conditions of processing your personal information contained in this document.

### **1. Personal Information**

When you use our services and access the Site, we receive certain personal information from you. We may receive the following personal information:

- information provided by you during account registration, including, without limitation, personal details, user name, address, phone number and email address;
- financial information collected by us when processing your payment, including, without limitation, credit card number, billing address;
- information connected with your browsing activities, statistical information, information on visits and use of the Site and services;
- data automatically collected by our software, for example: IP address, cookies data, performance specifications of your hardware and software, date and time of access to the Site, the URL of the page requested;
- other information about you stored for the use of the Site or information received from third-party providers.

By voluntarily providing us with the personal information, you agree to permit us to use and store it as described in this Privacy Policy.

### **2. Use of Personal Information**

We process your personal information in order to identify you, process registration, log in to the Site, facilitate our communication, contact you and process any requests and applications, improve our services and website, target advertisements, carry out statistical analysis based on anonymized data.

We have no control over and are not responsible for processing of the information by third party websites, which you may access by hyperlinks on the Site.

### **3. Cookies**

Like many websites, we use “cookies”. A cookie is a small data file that we transfer to your device to enable our systems to recognize your device and to provide certain features. These data files may be cookies, pixel tags, e-tags, “Flash cookies”, or other local storage provided by your browser or associated applications (“cookies”).

Cookies allow your browsing choices to be remembered and make you recognized when you return to the Site. We also use cookies to ensure that the Site works properly, to provide customized services, to target advertising displayed to you, for statistical and research purposes and to improve our services.

You may change your web browser’s settings to stop accepting cookies, to enable your browser to notify you when you receive new cookies, or to prompt you before accepting a cookie from a website you visit. However, because cookies allow you to take advantage of some of our essential features, we recommend that you leave them turned on. For instance, if you block or otherwise reject our cookies, you may not be able to use the Site or services entirely.

### **4. Advertisement**

We use services of Service Providers, including Google. Such Service Providers use cookies to serve ads based on a user’s prior visits to the Site. Google’s use of the DoubleClick cookie enables it and its partners to serve ads to users based on your visit to our Site and/or other sites on the Internet. Users may opt out of the use of the DoubleClick cookie for interest-based advertising by visiting Ads Settings at Google page. You may also opt out of a third-party vendor’s use of cookies for interest-based advertising by visiting [aboutads.info](http://aboutads.info).

We may also use services of the third-party vendors and ad networks serving ads on our Site. You may visit those websites to opt out of the use of cookies for interest-based advertising (if the vendor or ad network offers this capability). Alternatively, you can opt out of some third-party vendor’s use of cookies for interest-based advertising by visiting [aboutads.info](http://aboutads.info).

When using our Site and Services, you consent to the storing and accessing of cookies or other information on your device where such activity occurs in connection with our Site and Services.

### **5. Google Analytics**

We may use Google Analytics software which places cookies on a user’s device to provide us the aggregated usage of data of the Site. Google Analytics uses first-party cookies to track user interactions. Analytical cookies allow us to count the number of users to the Site, and to see how users move around the Site when they are using it. This helps us to improve the quality of the

delivery of our materials. No personal data is collected or retained by means of the cookies used to generate this statistical information.

As a user you can prevent Google Analytics collecting traffic log data. To provide website users with more choice on how their data is collected Google Analytics has developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the Site visit should not be sent to Google Analytics. If you want to opt out, download and install the add-on for your current web browser, which is available at <http://tools.google.com/dlpage/gaoptout> and enables a user to opt out. The Google Analytics Opt-out Browser Add-on is available for Internet Explorer, Google Chrome, Mozilla Firefox, Apple Safari and Opera.

## **6. Remarketing**

We may use remarketing or similar audiences feature in Google AdWords and other third-party websites which allow us to reach people who previously visited our Site and match the right people with the right message. You may opt out of Google's remarketing at <https://www.google.com/settings/u/0/ads/authenticated>.

## **7. Protection of the Personal Information**

The protection of the personal information and your privacy is important to us. We do not disclose the personal information to any third parties except for our service providers engaged by us to perform some functions on our behalf, including, but not limited to, data entry, database management, promotions, products and services alerts, membership authentication and verification services, analyzing data, providing marketing assistance, providing search results and links, payment extension services, processing credit card payments, and providing user service (the "Service Providers"). These Service Providers are under a duty of confidentiality to us and are only permitted to use the personal information in connection with their functions and not for their own purposes. When processing payments, the Service Providers are solely responsible for security of your payments. Such Service Providers, including, without limitation, PayPal and Stripe, may have their own terms of use, and privacy policies which regulate your use their tools and features.

We may disclose the personal information to a third-party in order to protect, establish, or exercise our legal rights or defend against legal claims, or when we believe in good faith that such disclosure is necessary to comply with the law, prevent imminent physical harm or financial loss, or investigate, prevent, or take action regarding illegal activities, suspected fraud, threats to our property, or violations of applicable law.

You understand that the personal information is available and accessible by our employees who we believe reasonably need to come into contact with that information to provide services or to deliver products to you or in order to do their jobs.

This Privacy Policy does not apply to the practices of third-parties that we do not own or control, or individuals that we do not employ or manage. This includes any third-parties whose websites may be referenced in the Site, and those that Site includes links to. You are encouraged to read the terms of use and privacy policies of any such third-party sites. We are not responsible in any way, for your use of such third-party sites.

Keep your usernames/passwords secure and do not allow anyone else to use your usernames/passwords to access the Site. You agree to immediately notify The Refinery of any unauthorized use of your account. The Refinery is not responsible for any loss that results from the unauthorized use of your username/password, with or without your knowledge.

## **8. Security**

The security of the personal information is important to us. We use certain technologies to secure sensitive information (such as credit card numbers). We follow generally accepted industry standards to protect your personal information, both during transmission and once we receive it.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

## **9. Confidentiality**

You shall be responsible for security of its account and personal information. If you register on the Site, you shall keep your account and password confidential. You shall be responsible for any activities that happen on or through your account. Any actions in or with the Site performed through your account shall be considered done by you.

You shall promptly inform us of any instances of unauthorized (not allowed by you) access to your account and/or any breach (alleged breach) of confidentiality. For security reasons, you shall securely log out after completing each session. We shall not be responsible for any potential loss or damage of information as well as any other consequences appearing as a result of failure by you to comply with this part of the Privacy Policy.

## **10. Accurate Information**

You are responsible for maintaining the accuracy and completeness of your personal information. You shall inform us in relation to any changes to your personal information.

## **11. User's Rights and Obligations**

Under the applicable laws, you may have the right to access to your personal information held by us and to request certain user's personal information to be corrected, edited and removed.

## **12. Minors**

Our services are not targeted to minors (those under the age of 13) and we do not intend to sell our products to minors. However, we have no way of distinguishing the age of individuals who access the Site. If a minor has provided us with personal information, you should immediately contact us in writing.

## **13. Data Retention**

We retain your personal information for as long as it is necessary, or your user's account is active or as needed to provide you with the services on the Site. If you no longer want us to use your personal information to provide you with the services, you may close your account. However, we may retain and use your personal information as necessary to comply with our legal obligations, resolve disputes and enforce our agreement.

## **14. Notifications**

From time to time we may send you messages that are service-related and required for our users, including newsletters and other alerts. We may also send you email relating to your personal transactions, about special promotions, featured investments and other news of the Site and services. We may also send you news and updates about changes to the Site and services. Such messages may be sent internally, by email or by push notifications. You may choose to subscribe or unsubscribe from such contact at any time.

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

We may revise the Privacy Policy at any time and in our sole discretion by posting the relevant revised Privacy Policy on the Site. By continuing to use the Site and services, you agree to be bound by the revised Privacy Policy.

## **16. For Users Who Reside in the European Union.**

If you live in a EU nation, when using the Site and submitting personal data to us, you may have certain rights under the General Data Protection Regulation (GDPR) and other laws. Depending on the legal basis for processing your PD, you may have some or all of the following rights:

The right to be informed: You have the right to be informed about the personal data we collect from you, and how we process it.

The right of access: You have the right to get confirmation that your personal data is being processed and have the ability to access your personal data.

The right to rectification: You have the right to have your personal data corrected if it is inaccurate or incomplete.

The right to erasure (right to be forgotten): You have the right to request the removal or deletion of your personal data if there is no compelling reason for us to continue processing it.

The right to restrict processing: You have a right to ‘block’ or restrict the processing of your personal data. When your personal data is restricted, we are permitted to store your data, but not to process it further.

The right to data portability: You have the right to request and get your personal data that you provided to us and use it for your own purposes. We will provide your data to you within 30 days of your request. To request your personal data, please contact us at the email address listed in [Contact Us](#), below.

The right to object: You have the right to object to us processing your personal data for the following reasons:

- Processing was based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics.
- Rights in relation to automated decision-making and profiling.

Automated individual decision-making and profiling: You will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Filing a Complaint with Authorities: You have the right to file a complaint with supervisory authorities if your information has not been processed in compliance with the General Data Protection Regulation. If the supervisory authorities fail to address your complaint properly, you may have the right to a judicial remedy.

## **17. Contact Us**

If you have any questions, recommendations, concerns or want to leave any feedback whatsoever in connection with this Privacy Policy please contact us at the following email address:  
[Info@refinerymedspa.com](mailto:Info@refinerymedspa.com)