

PRIVACY POLICY

This Privacy Policy applies to www.kimberhealth.com, collectively referred to as “the Website.”

This policy is effective as of: **July 11, 2024**

New York Wealth Planning Group Inc. (“NYWPG”) is committed to protecting your privacy. This Privacy Policy discloses how we collect, share, and use information about you that NYWPG collects through the website and our use of and your ability to correct the information collected. The Website provides visitors with information about NYWPG and our products and services. In using and viewing the Website, you understand that NYWPG may use your “Personally Identifiable Information” (such as name, email address, street address, or telephone number) subject to the terms of this Privacy Policy.

Children's Online Privacy Protection Act

- NYWPG complies with the Children's Online Privacy Protection Act of 1998 ("COPPA"). COPPA requires that web site operators never knowingly request personally identifiable information from anyone under the age of 13 without requesting verifiable parental consent. In accordance with COPPA, we do not knowingly collect any personally identifiable information from children under the age of 13. We recommend that no one under the age of 18 submit personally identifiable information to our Site. In the event that we determine that a user of this Site is under the age of 13, we will not maintain or use his or her personally identifiable information.

Information Collected on the Website

Certain of the information provided by NYWPG on the Website is available without NYWPG collecting any Personally Identifiable Information from you. In using and viewing the Website, you understand that NYWPG may use your Personally Identifiable Information subject to the terms of this Privacy Policy. NYWPG does collect Personally Identifiable Information that you provide voluntarily through the Website. Some examples of times when NYWPG collects Personally Identifiable Information include when you:

- Request information about NYWPG through the Website;
- Subscribe to an e-mail newsletter;
- Purchase NYWPG products and/or services;
- Send NYWPG an email message; or
- Otherwise provide NYWPG with Personally Identifiable Information.

You have a choice as to whether to provide NYWPG with any Personally Identifiable Information. Although you are not required to disclose any Personally Identifiable Information to us, some portions of the Website may not be available to you without your providing this information.

Due to the business-oriented nature of our business and the Website, the Website is not designed to appeal to anyone under the age of 18. We do not knowingly request or receive any information from children.

Use of Your Information

NYWPG uses any Personally Identifiable Information you provide in a limited number of ways. We may use your Personally Identifiable Information to:

- To respond to your emails sent to NYWPG;
- To make the site easier for you to use by not making you enter your Personally Identifiable Information more than once;
- To provide you with information about NYWPG and its products and services;
- To conduct a transaction that you have requested
- To verify your identity and grant access to your account;
- To carry out administrative or legal tasks
- To alert you to updated information and other news and information from NYWPG; and
- For any other purpose NYWPG deems appropriate

In addition, NYWPG may hire other companies to perform services on our behalf such as operating certain aspects of the Site or sending you email. These other companies may be supplied with or have access to your Personally Identifiable Information for the sole purpose of providing these services to us or on our behalf. NYWPG may also use third-party ad servers or ad networks to deliver ads to you on NYWPG' behalf. These third-party ad servers may be supplied with or have access to your Personally Identifiable Information for the sole purpose of providing these services to us or on our behalf. They also may collect and use non-personally identifiable information about your visits to the Site in order to send advertisements that may be of interest to you.

We may also on occasion combine information about you that we have with information we obtain from other parties to enhance our ability to market to you those products or services that may be of interest to you.

Though we will make every effort to preserve user privacy, we may need to disclose Personally Identifiable Information when required by law or if we have a good-faith belief that the action is necessary to comply with a pending judicial proceeding, a court order or legal process served on NYWPG or to protect our rights or the rights of others, to fight fraud, identity theft, to ensure the integrity and operation of our business and systems, or to protect the rights, property or safety of NYWPG, its employees, members or others.

Control of your Personal Information

When you register, or otherwise give us Personally Identifiable Information, NYWPG will not share that information with third parties without your permission, other than for the limited exceptions provided herein. Such Personally Identifiable Information will only be used for the purposes set forth herein. NYWPG may send periodic emails informing you of changes and updates regarding the Website. NYWPG maintains appropriate technical and organizational

measures to protect your Personally Identifiable Information against accidental or unlawful processing, including protecting your Personally Identifiable Information against unauthorized access, maintaining the confidentiality, integrity and availability of your Personal data, and training personnel on information security requirements.

However, no security measure can guarantee against compromise. You also have an important role in protecting your Personally Identifiable Information. You should not share your username and password with anyone, and you should not re-use passwords across more than one website. If you have a reason to believe that your Personally Identifiable Information has been compromised, please contact us as detailed herein.

How We Share Your Information

We will not disclose your Personally Identifiable Information to others without your permission, except as explained in this Privacy Policy.

Aggregate Information

On an aggregate basis only, we collect comprehensive demographic, business information and data, and other non-identifying information about users of the Website. NYWPG will never disclose any Personally Identifiable Information as part of this aggregate information but we may lend, sell, share or otherwise disclose aggregate information with others so we can perform research and provide the results to third parties, enhance and market the Website, and conduct accounting and process record keeping functions.

Other websites and links

We may include links to other websites that we think will be of interest to you or operated by our business partners, affiliates, advertisers, and others. These third parties have separate data collection and privacy practices independent from ours, and NYWPG cannot be responsible for their policies or activities. Please contact those third parties directly if you have questions about their privacy policies.

Cookies, Web Beacons, Clear Gifs, and IP Addresses

NYWPG may also use a feature of your browser called a “cookie.” Your cookie automatically identifies your computer - but not you - to our servers when you visit the Website and allows us to correlate your computer with certain usage patterns which are stored in our log files. We use cookies to gather general, aggregate statistics about the overall popularity and usage of the Website. NYWPG also uses more temporary cookies, often referred to as session cookies, to keep a user logged into the system and aid in the exchange of information between pages without loss of data. Such a cookie, however, is only stored for the current browsing session and is deleted once the browser is closed. NYWPG can also only read cookies from the Website. Search for Cookies under your Web browser's Help menu for more information on cookie management features available to you. If your browser is set to reject all cookies, the Website may not function properly.

NYWPG may also collect information through the use of clear gifs (also called Web Beacons and

Web Bugs) in selected email messages we send to you. These are tiny graphic files, not visible to the human eye, that are included in HTML-based emails and used to let us know which emails we send are opened. Clear gifs may also see or read cookies on your computer. When authorized by NYWPG, third parties specializing in monitoring aggregate statistical use of our site with whom we contract, may use cookies, our web log files, web beacons, and other monitoring technologies to compile anonymous aggregate data.

Additionally, we may use IP address information to count and track aggregate visits to Website, to help diagnose problems with our server, and to administer the Website. NYWPG does not link IP addresses to anything personally identifiable so while a particular user's session can be tracked, the user remains completely anonymous.

Accessing and Updating Information

NYWPG does not currently have an online method for users to delete their Personally Identifiable Information contained in our database. However, in some jurisdictions you may modify or withdraw your consent or restrict how your Personally Identifiable Information is processed; you may change or update the Personally Identifiable Information we have collected; receive an electronic copy of the Personally Identifiable Information we have about you for data portability; request that we delete it, or request that we change

how we use it by sending an email to nywpgpartners@gmail.com with your instructions. We will respond to your instructions in a manner consistent with applicable law, including any exceptions thereto which may result in denial or only partial compliance with your instructions. Please note that this deletion may otherwise impact prior transactions performed on the Website.

California Privacy Notices and Rights

If you are a California resident, you have certain rights with respect to your personal information.

i. Notice at Collection and Notice of Financial Incentives

At or before the time of collection, you have a right to receive notice of our practices, including the [categories](#) of personal information and sensitive personal information to be collected, the [purposes](#) for which such information is collected or used, whether such information is "[sold or shared](#)" as defined under California law and how long such information is [retained](#). You can find those details in this Privacy Policy under the relevant headings. For the Notice of Financial Incentives, see above.

ii. Rights to Know, Correction and Deletion

You have a right to request that we disclose to you the personal information we have collected about you. You also have a right to request additional information about our collection, use, disclosure, or sale of such personal information. Note that we have provided much of this information in this Privacy Policy. You also have rights to request that we correct inaccurate personal information and that we delete personal information under certain circumstances, subject to a number of exceptions. Under the California Consumer Privacy Act and the California Privacy Rights Act, or "CCPA" for short in this Policy, these rights are subject to certain exceptions: for example, we may need to retain your personal information to complete a transaction or other action you have requested. If your request is subject to one of these exceptions, we may deny your request.

iii. "Do Not Sell or Share My Personal Information"

To the extent NYSPG "sells" your personal information (as the term "sell" is defined under the CCPA), you have the right to opt-out of that "sale" on a going-forward basis at any time.

If you're a California resident, you have a right to opt-out from the "sale" or "sharing" of your personal information with third parties who are not our service providers (as those terms are defined under the CCPA). To exercise this right, please contact us as above. You can also submit a request to opt-out by emailing us at nywpgpartners@gmail.com with the subject line "California Resident - Do Not Sell or Share." Finally, if your browser supports it, you can turn on the [Global Privacy Control](#) to opt-out of the "sale" or "sharing" of your personal information.

We do not knowingly "sell" or "share" (as those terms are defined by the CCPA) the personal information of minors under 16 years old.

iv. Right to Limit Use and Disclosure of Sensitive Personal Information

If you are a California resident, you have a right to limit our use of sensitive personal information for any purposes other than to provide the services or goods you request or as otherwise permitted by law. To opt-out from such additional purposes, contact us at nywpgpartners@gmail.com.

v. Authorized Agents

You can designate an authorized agent to make a request to exercise your rights under the CCPA on your behalf. In order to do that, please provide the agent with written permission, signed by you, authorizing the agent to submit the request on your behalf. The agent must submit that written permission along with the request. We may contact you to verify your identity — and the authorized agent’s permission — before a response to the request is sent.

vi. Non-Discrimination Rights

You may exercise any of your rights listed in this section without fear of unlawful discrimination.

vii. Record of Requests

We keep a record of requests that we received from California residents.

viii. California “Shine the Light” Privacy Rights

Under the California “Shine the Light” law, California residents can opt out of our sharing of their information to third parties (and sometimes affiliates) for their direct marketing purposes. We do not generally disclose your personal information as specifically defined in the Shine the Light law. To the extent we share your email address with a third party in connection with online marketing in a way that might be covered by Shine the Light, you may opt out of such sharing by contacting us at nywpgpartners@gmail.com.

ix. Removal of Content for California Minors

If you’re a California resident under 18 years old and you have an account with us you can ask us to remove content or information you’ve posted. Email us at nywpgpartners@gmail.com with “California Under 18 Content Removal Request” in the subject line and tell us what you want removed. We will make reasonable efforts to remove the post from public view, although we cannot ensure the complete removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Changes to this Privacy Policy

We encourage you to review our Privacy Policy not just the first time you visit the Website but periodically afterwards since we may modify our Privacy Policy from time to time. The date of the last update of the Privacy Policy will always be posted below:

**THIS PRIVACY POLICY WAS LAST REVISED ON
July 11, 2024.**

If we make any substantive changes to our Privacy Policy in the future with regard to how we use your Personally Identifiable Information, we will incorporate those changes here. Your continued use of the Website after the changes are posted constitutes your agreement to the changes, both with regard to information we have previously collected from you and with regard to information we collect from you in the future. If you do not agree to the changes, please discontinue use of the Website. Lastly, if NYWPG is sold or merged with another company, your Personally Identifiable Information will be included as part of the sale but unless you’re notified that the Privacy Policy

is changed, your Personally Identifiable Information will be maintained in the same manner.

International Users

Like almost every website, our Website is accessible around the world. By visiting the Website and providing your information, you acknowledge and agree that your personal information can be stored for the purposes identified in this Privacy Policy unless you notify us otherwise as specified herein. We process and store your information in North America and your information may be stored on servers located outside your residential jurisdiction and which may have less stringent privacy practices than your own. If you access the Website from outside the United States, your usage of the Website constitutes consent to the transfer of your data outside of your country and to North America unless you notify us otherwise as provided herein.

Security

This Website has industry-standard security measures in place to protect the loss, misuse, and alteration of the information under our control, and we make good faith efforts to store your Personally Identifiable Information in a secure operating environment. Unfortunately, no data transmission over the Internet can be guaranteed to be absolutely secure. As a result, while we strive to protect your Personally Identifiable Information, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. If NYWPG provides you with a user name and password to access portions of the Website or as part of your subscription, to the fullest extent permitted by law NYWPG disclaims any responsibility for a breach of privacy as a result of your willingly or inadvertently disclosing your user name and password to others.