

Privacy Policy

Effective Date: September 4, 2025

This Privacy Policy explains how Create Change Lab, LLC (together, “we,” “our,” or “us”) collect, use, share, and protect your personal data. For the purposes of applicable data protection law, including the EU General Data Protection Regulation (“GDPR”), we are the data controllers responsible for your personal data.

Information We Collect

We may collect the following types of information from you:

- **Personal Information:** When you make a purchase, subscribe to our newsletters, or complete a survey, we may collect your name, billing and shipping address, email address, phone number, payment details, and related information.
 - **Health Information:** When you complete a health-related questionnaire or program survey, we may collect information about your symptoms, lifestyle, or health status.
 - **Automatically Collected Information:** We use cookies, tags, and similar technologies to collect information such as IP address, browser type, operating system, referring URLs, browsing behavior, and usage data.
 - **Aggregated/Anonymous Data:** We may collect aggregated data for analytics, research, marketing, and promotional purposes. This data does not identify you individually.
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How We Use Your Information

We process your personal data for the following purposes and on the following legal bases:

1. **To perform a contract:** To process orders, manage billing and shipping, and provide customer service.
2. **With your explicit consent:**
 - To send you newsletters, promotional emails, and marketing communications (including tailored offers such as a free trial).
 - To collect and analyze health survey responses for research purposes, such as studying program results and preparing publications in scientific journals.

- To aggregate and share survey results in marketing materials, demonstrating program outcomes. Your responses will only be used in aggregate and never published in a way that identifies you personally.
 - 3. To comply with legal obligations: To meet legal, regulatory, and tax requirements.
 - 4. For our legitimate interests: To operate and improve our websites and services, detect and prevent fraud, and protect our rights—provided those interests are not overridden by your rights and freedoms.
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Sharing Your Information

We may share your personal data with:

- Service providers and vendors (e.g., payment processors, shipping partners, IT and analytics providers, Klaviyo for email marketing) who process data on our behalf.
- Related companies within our corporate group.
- Legal authorities when required to comply with the law, enforce agreements, or protect safety.

We do not sell your personal data.

Cookies and Tracking Technologies

We use cookies and similar technologies to:

- Recognize repeat visitors.
- Personalize your browsing experience.
- Analyze traffic and usage patterns.
- Support marketing and advertising activities.

You can manage cookie preferences through your browser settings. Some site features may not function properly if cookies are disabled.

Marketing and Research Use of Survey Data

If you provide information in a health survey or questionnaire, we may use it for:

- Research purposes — including aggregation and analysis of results for potential scientific publication.
- Marketing purposes — including aggregation and display of overall program results to demonstrate benefits to prospective participants.
- Direct communication — including tailored email offers, such as a free trial.

Your survey responses will only be used in aggregate, and will never be published or marketed in a way that identifies you personally. Consent for this processing is requested explicitly at the time of survey completion.

Data Retention

We retain personal data only as long as necessary for the purposes described in this Privacy Policy, unless a longer retention period is required by law.

Your Rights

If you are located in the EEA, UK, or another jurisdiction with similar rights, you have the right to:

- Access the personal data we hold about you.
- Request correction of inaccurate or incomplete data.
- Request deletion of your personal data.
- Restrict or object to processing.
- Request a copy of your data in a portable format.
- Withdraw consent at any time (without affecting the lawfulness of processing prior to withdrawal).
- Lodge a complaint with your local supervisory authority.

To exercise these rights, please contact us at support@createchangelab.com.

Children's Privacy

Our websites and programs are not directed to individuals under the age of 18, and we do not knowingly collect personal data from children.

Data Security

We take reasonable measures to protect personal data against loss, misuse, unauthorized access, disclosure, alteration, and destruction. However, no transmission or storage system can be guaranteed 100% secure.

Changes to This Policy

We may update this Privacy Policy from time to time. Changes will be posted on this page with a revised “Effective Date.”

Contact Us

If you have questions, requests, or concerns about this Privacy Policy or our data practices, please contact us at:

Email: support@createchangelab.com

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