

ACTIVE GROUP HOLDINGS

PRIVACY POLICY

Last Updated: November 22, 2025

INTRODUCTION

We are committed to protecting the privacy of our visitors and users, and providing them with detailed information as to how their information is used and protected.

This Privacy Policy describes how Active Group Holdings, LLC and its subsidiaries and affiliates, including Active Management Solutions, LLC, d/b/a Active Medical Solutions, (the "MSO"), and Active Life Coaching, LLC ("ALC") (collectively "Active Group Holdings," "we," "us," or "our") collect and process your personal information through our websites and services (together "Services"). This Privacy Policy is incorporated into our Terms of Use. By using our Services, you are consenting to the practices described in this Privacy Policy. If you do not agree with this Privacy Policy, do not access or use the Services.

PROTECTED HEALTH INFORMATION

This Privacy Policy applies to general website usage and non-health information. When you complete intake forms, medical questionnaires, or provide health information to facilitate medical services through the MSO's platform, that information is considered Protected Health Information ("PHI") and/or medical information and is governed by applicable state and federal laws, including the Health Insurance Portability and Accountability Act ("HIPAA") and the FTC Health Breach Notification Rule.

Privacy practices with respect to PHI and/or medical information are set forth in our separate Notice of Privacy Practices, which is available on our website and is provided to you when you complete intake forms or provide health information. The Notice of Privacy Practices explains how Active Management Solutions collects, uses, and protects your health information.

INFORMATION COLLECTED BY US

We collect the following types of information:

Information You Disclose

We receive information about you when you provide it through forms or surveys, and when you sign up for a user account and use our Services. In addition, we receive information about you when you use, edit, or access your account. As a result of those actions, you may supply us with certain information, including, but not limited to, your name, e-mail address, phone number, gender, date of birth, address, payment or financial information, and other information.

Information Automatically Collected

We may automatically collect certain information resulting from your use of our Services. This information may include your IP address, login details, password, and the location of your device. We may also use device identifiers, cookies, web beacons, tokens, scripts, and other technologies on devices, applications, e-mails, and our web pages to collect information about your browsing actions and patterns, information about your devices (such as information related to your computer or device, internet connection, operating system, and internet browser type), or other technical information.

INFORMATION COLLECTED BY THIRD PARTIES

When you use the Services, certain third parties may use automatic information collection technologies to collect information about you or your device. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices, including data privacy and security process and standards of any third parties, including physicians and other health care providers using the Services. These third parties may include: advertisers, ad networks, and ad servers; analytics companies; your mobile device manufacturer; and your mobile service provider. The information they collect may be personally identifiable and may include information about your online activities over time and across different websites, apps, and other online services websites. These third parties may use this information to provide you with interest-based advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

HOW WE USE YOUR INFORMATION

We collect your information to provide and improve our Services. In addition, we may disclose your deidentified and anonymized information for research or commercial purposes, except for your payment and financial information, and information prohibited from disclosure pursuant to federal and state law.

IMPORTANT: We will not use your data for new purposes that materially expand how we use your information (such as sharing with third parties for purposes not originally disclosed, or using your data for AI training) without first obtaining your affirmative consent. If we wish to use your previously collected data for such new purposes, we will notify you via email and provide you the opportunity to opt in before we apply any such changes to your existing data.

Information You Disclose

Information you disclose is used to provide, improve, and develop our Services. We, our partners, contractors, or agents, may use personal information about you for various purposes, including, but not limited to:

- Conducting internal research and development and making business decisions about current and future product and Service offerings;
- Responding to your comments, questions and requests and providing customer service;
- Communicating with you about products, services, offers, promotions, rewards and events and providing news and information we think will be of interest to you;
- Managing your online account(s) and sending you technical notices, updates, security alerts and support and administrative messages;
- Personalizing your online experience and providing advertisements, content or features that match your profile and interests;
- Monitoring and analyzing trends, usage and activities;
- Complying with any court order, law, or legal process, and responding to any government or regulatory request;
- Enforcing or applying our Terms of Use; and/or
- Fulfilling any other purpose for which you provided the information.

Information Automatically Collected

Information automatically collected is used generally to improve our Services. In addition to the uses related to information you disclose, as outlined above, we may use information automatically collected in a similar manner. We may also combine this information with other

information we collect about you and use it for various purposes, such as improving our websites and your online experience, understanding which areas and features of our sites are popular, counting visits, tailoring our communications with you, determining whether an email has been opened and links within the email have been clicked and for other internal business purposes.

HOW COLLECTED INFORMATION IS SHARED BY US

We may share your personal information with our affiliates, partners and other third parties, including subcontractors, to:

- assist us with the maintenance and operation of the Services;
- market and promote the Services, including the measurement of the success of such efforts;
- comply with any court order, law, or legal process, including to respond to any government or regulatory request; to enforce or apply our Terms of Use;
- protect our, our customers', or others rights, property, or safety; or
- to disclose to a buyer or other successor entity 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 information held by us is among the assets transferred.

Disclosure Required by Law or to Prevent Harm

We may disclose your personal information, including health information when permitted or required by law, including but not limited to:

- When required by court order, subpoena, or other legal process;
- To report suspected abuse, neglect, or domestic violence to appropriate authorities;
- When we have a good faith belief that disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or the health or safety of others;
- To report threats of harm to self (suicide) or others (homicide) to appropriate authorities and individuals at risk;
- For law enforcement purposes when required by law or in response to a valid legal request;
- To comply with workers' compensation or similar programs; and
- As otherwise required or permitted by applicable federal or state law.

For health information specifically, these disclosures are governed by HIPAA and state law. Please see our Notice of Privacy Practices for more detailed information about required and permitted disclosures of health information.

In addition, we may disclose your deidentified and anonymized information for commercial purposes, except for payment and financial information, and information prohibited from disclosure pursuant to federal and state law.

PRIVACY AND SECURITY

We design our systems with your security and privacy in mind, and we maintain administrative, technical, and physical safeguards to protect your personal information from unauthorized access, use, or disclosure. These safeguards vary based on the sensitivity of the information that is collected and comply with applicable federal and state laws, including requirements under the FTC Safeguards Rule and FTC Health Breach Notification Rule.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. Do not share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

DATA BREACH NOTIFICATION

In the event of a security breach involving unauthorized acquisition of your unencrypted personal information or health information, we will notify you and, where required by law, relevant regulatory authorities (including the Federal Trade Commission), as soon as possible and no later than required by applicable law.

For breaches involving health information covered by the FTC Health Breach Notification Rule, we will provide notification within sixty (60) days of discovery of the breach. Notification will be provided via the email address you provided during registration, unless otherwise required by law. The notification will include:

- A description of what happened and the date of the breach;
- The types of unsecured health information that were involved;
- Steps you should take to protect yourself;
- What we are doing to investigate, mitigate harm, and prevent future breaches; and
- Contact information so you can ask questions.

NOTIFICATION OF CHANGES

We reserve the right to change this Privacy Policy from time to time in our sole discretion. The date the Privacy Policy was last revised is identified at the top of this page.

IMPORTANT: If we make material changes to how we treat users' personal information, including changes that expand our data practices (such as sharing your data with third parties for new purposes not originally disclosed, using your data for AI training, or other significant changes to how we collect, use, or share your data), we will:

- Notify you by email at the address you provided during registration;
- Provide prominent notice on our website;
- Obtain your affirmative consent before applying those changes to data we have already collected from you; and
- Give you the opportunity to opt out of the material changes.

If you do not affirmatively consent to material changes, the prior privacy policy terms will continue to apply to your existing data. Your continued use of our Services after being notified of non-material changes indicates your consent to the Privacy Policy as posted. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this Privacy Policy to check for any changes.

ACCESSING/DELETING YOUR PERSONAL INFORMATION

You may be able to update, correct, or delete your personal information by contacting us at [INSERT CONTACT EMAIL]. We may not be able to delete your information, personal or otherwise, without also deleting your account, and we may not accommodate a request to change or delete information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

RETENTION OF YOUR INFORMATION

We keep your information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws. Health information is retained in accordance with applicable federal and state record retention requirements.

CALIFORNIA RESIDENTS

Consumers residing in California are afforded certain additional rights with respect to their personal information under the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA"). If you are a California resident, this section may apply to you at such time that we become subject to CCPA/CPRA. At this time, we are not subject to the CCPA/CPRA.

If you are a California resident, and if the CCPA/CPRA applies to us, you can make certain requests regarding your personal information. We will fulfill each of these requests to the extent required and permitted by law.

You can ask us what personal information we have about you, including a list of categories of your personal information that we have sold and a list of categories of your personal information that we have shared with another company for business purposes. If you make this request, and to the extent required by law, we will return to you any of the following, as applicable: the categories of personal information we have collected about you; the categories of sources from which we collect your personal information; the business or commercial purpose for collecting or selling your personal information; the categories of third parties with whom we share personal information; the specific pieces of personal information we have collected about you; a list of categories of personal information that we have sold, along with the category of any other company we sold it to; and, a list of categories of personal information that we have disclosed for a business purpose.

You can ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to personal information we collected about you in the previous 12 months.=

In addition, you have the right to ask us to delete your personal information. Once we receive a request, we will delete the personal information (to the extent required by law) we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through de-identification of the information. Choosing to delete your personal information may impact your ability to use our websites and online features.

Finally, you can ask that we stop selling your personal information or disclosing it for a business purpose. We share or sell your personal information as described in the "How Collected Information is Shared by Us" section of this policy.

We will not discriminate against any consumer for exercising their rights under the California Consumer Privacy Act. This generally means we will not deny you goods or services, charge different prices or rates, provide a different level of service or quality of goods, or suggest that you might receive a different price or level of quality for goods.

You can make these requests by calling or texting (239) 427-1553 , e-mailing support@aghold.co , or using our Website's contact us form.

YOUR STATE PRIVACY RIGHTS

Certain states afford their residents additional rights with respect to their personal information. The following states have enacted comprehensive privacy laws that may apply: Colorado (effective July 1, 2023), Connecticut (effective July 1, 2023), Virginia (effective January 1, 2023), Utah (effective December 31, 2023), Montana (effective October 1, 2024), Oregon (effective July 1, 2024), Texas (effective July 1, 2024), Delaware (effective January 1, 2025), Iowa (effective January 1, 2025), Nebraska (effective January 1, 2025), New Hampshire (effective January 1, 2025), New Jersey (effective January 15, 2025), Tennessee (effective July 1, 2025), Maryland (effective October 1, 2025), Minnesota (effective July 31, 2025), and others.

These states generally provide their residents with rights to:

- Confirm whether we process their personal information;
- Access and delete certain personal information;
- Data portability;
- Opt-out of personal data processing for targeted advertising and sales; and
- In some states, correct inaccuracies in their personal information and opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please contact us at: support@aghold.co .

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request by contacting us at: support@aghold.co .

CHILDREN UNDER 13

We do not knowingly collect personally identifiable information directly from children under the age of 13. Our Services are directed to adults and are not intended for use by children under 13. However, we may collect information about children under 13 when provided by their parent or legal guardian for the purpose of facilitating medical services (such as urgent care or telehealth consultations for minors). When a parent or legal guardian provides information about their child, the parent or guardian is responsible for providing such information and consenting to its use as described in this Privacy Policy and our Notice of Privacy Practices.

CONTACT INFORMATION

If you have any questions about this Privacy Policy, please contact us at: support@aghold.co .
You may also request that we help you access, modify or delete your data, or ask that we not sell or share your data, by contacting us using the information provided above.

For questions specifically related to health information and HIPAA rights, please refer to our Notice of Privacy Practices or contact us at: support@aghold.co .