

TATTVA HEALTH INC.

Privacy Policy

Effective Date: March 17, 2026 | Last Revised: March 17, 2026

Tattva Health Inc. (“Tattva,” “we,” “us,” or “our”) is committed to protecting your privacy and handling your personal information with transparency, care, and integrity. This Privacy Policy describes how we collect, use, store, share, and protect information about you in connection with your use of our website at www.tattva.health (the “Site”) and any products, services, programs, or experiences we offer (collectively, the “Services”). By using the Site or our Services, you agree to the terms of this Privacy Policy.

Because Tattva operates at the intersection of cardiac recovery protocols, community experiences, and biometric data, we apply heightened care to the collection and handling of health-related information. Please read this Policy carefully.

1. Information We Collect

We collect several categories of information, depending on how you interact with us:

1.1 Information You Provide Directly:

- Contact information: name, email address, phone number, mailing address;
- Account credentials: username and password;
- Payment information: billing address and payment method details (processed by our third-party payment processor; Tattva does not store full payment card numbers);
- Retreat and program registration details, including dietary preferences and accommodation needs;
- Health intake and screening information: medical history, current medications, cardiac or cardiovascular history, physician contact details, and relevant conditions you voluntarily disclose on pre-participation questionnaires;
- Communications and correspondence you send to us, including program feedback and customer support inquiries; and
- User-generated content, including reviews, testimonials, and social sharing.

1.2 Health and Biometric Information:

In connection with certain Tattva programs, retreats, or clinical pilot initiatives, we may collect or receive the following categories of health and biometric data, subject to your consent and the terms of any applicable informed consent agreement:

- Beat-to-beat heart rate, resting heart rate, sleep metrics (sleep duration, quality, stages, etc.), respiratory rate data, actigraphy and activity data, stress, strain collected via wearable biosensors or approved third-party devices;
- Voice analytics data, including acoustic biomarker assessments;
- Stress response and recovery measurements derived from program participation;
- Self-reported wellness scores, mood, and somatic symptom data collected via intake forms, questionnaires or program check-ins; and

- Physician-provided health records or cardiac history shared with your consent.

This health and biometric data is collected to personalize your program experience, generate wellness insights, and, where applicable, support validated research outcomes. We may also use this data in the following ways: (a) to send you personalized communications about Tattva Health Inc. programs and services relevant to your wellness journey, with your explicit opt-in consent, which you may withdraw at any time; (b) to publish de-identified or aggregated biomarker and outcome data in case studies, research summaries, or marketing materials, where no individual participant can be identified; and (c) to share individually identifiable health or biomarker data in case studies or marketing materials, solely pursuant to a separate signed Photo, Data, and Case Study Release Authorization.

1.3 Automatically Collected Technical Information:

- IP address and approximate geographic location;
- Browser type, operating system, and device identifiers;
- Pages visited, time on page, and click-stream data;
- Referring URLs; and
- Cookie and similar tracking technology data (see Section 6).

1.4 Information from Third Parties:

- Payment processors who confirm transaction status;
- Wearable device manufacturers or integrated health platforms, where you have connected your device and authorized data sharing; and
- Healthcare providers or clinical partners who share information with us pursuant to your written authorization.

2. HIPAA Notice and Health Data Classification

Tattva is a wellness and cardiac recovery support company. Tattva is not a Covered Entity under the Health Insurance Portability and Accountability Act (“HIPAA”) in most contexts, as we do not bill health insurers or operate as a healthcare provider in the regulatory sense. However, Tattva treats health and biometric information with a level of care consistent with HIPAA’s principles as a matter of policy, and we take the security of this data extremely seriously.

Where Tattva collaborates with HIPAA-covered healthcare institutions or providers in connection with clinical pilot programs, any data sharing between Tattva and those entities will be governed by a signed Business Associate Agreement (“BAA”) or equivalent data-sharing agreement.

We distinguish between: (a) General wellness data – information such as self-reported stress levels, retreat preferences, publicly available wellness content interactions, and general usage data – which we handle in accordance with this Privacy Policy; and (b) Sensitive health and biometric data – including biometric measurements such as Heart Rate Variability (HRV), sleep metrics, and voice analytics, as well as cardiac history, medication records, and clinical assessment data – which is subject to additional safeguards described in Section 3 and applicable state biometric privacy laws.

3. How We Use Health and Biometric Information

Health and biometric information that you provide or that we collect through program participation is used only for the following purposes:

- To deliver, personalize, and improve your Tattva program experience;
- To generate individual wellness reports and HRV or biomarker feedback for your personal use;
- To assess your suitability for and safety in specific program activities;
- To conduct anonymized or de-identified program outcome analysis and quality improvement;
- To support Tattva's wellness research and program validation work, where you have provided separate informed consent; and
- To communicate with your designated healthcare provider, if you have explicitly authorized us to do so.

We do not sell, license, or share your health or biometric information with third-party advertisers, ad platforms, or data brokers for any purpose.

De-identified or aggregated program outcome data may be used in Tattva Health Inc. marketing, public communications, and research publications. Individually identifiable data will only be used for such purposes pursuant to a separately signed Photo, Data, and Case Study Release Authorization.

4. Why We Collect and Process Your Information

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

4.1 To Provide and Fulfill Services:

- Process registrations, payments, and program enrollments;
- Deliver retreat logistics, program materials, and digital access;
- Respond to customer support inquiries; and
- Communicate important notices regarding your account or programs.

4.2 For Legitimate Business Operations:

- Analyze Site usage and program outcomes to improve our offerings;
- Detect and prevent fraudulent, unlawful, or harmful activity;
- Maintain security of our Site and systems; and
- Fulfill legal and regulatory obligations.

4.3 With Your Consent:

- Send you marketing and promotional communications (where you have opted in);
- Use your testimonials or anonymized case studies in our materials; and
- Share your information with clinical or research partners for program validation studies.

5. How We Share Your Information

We do not sell your personal information. We share your information only as described below:

5.1 Service Providers:

We engage trusted third-party vendors to support our operations, including payment processors, cloud hosting providers, email service providers, data analytics platforms, and wearable device integration services. These vendors are contractually prohibited from using your data for any purpose other than providing services to Tattva.

5.2 Clinical and Research Partners:

Where Tattva collaborates with academic medical centers, clinical advisors, or research institutions, we may share limited, de-identified program data pursuant to data use agreements. Any sharing of individually identifiable health data with clinical partners will require your prior written authorization, pursuant to a separately signed data use consent or Release Authorization.

5.3 Legal Obligations:

We may disclose your information when required by law, court order, or regulatory authority, or where we have a good faith belief that disclosure is necessary to protect the rights, safety, or property of Tattva, our users, or the public.

5.4 Business Transfers:

If Tattva undergoes a merger, acquisition, or sale of substantially all of its assets, your information may be transferred to the successor entity, subject to equivalent privacy protections. We will notify you of any such transfer as required by applicable law.

5.5 With Your Consent:

We may share your information in any other circumstance with your explicit consent.

6. Cookies and Tracking Technologies

We use cookies, web beacons, pixels, and similar technologies to collect Usage Data and improve Site functionality. Cookies help us remember your preferences, analyze Site traffic, and where applicable, support marketing activities.

Types of cookies we use:

- Essential cookies: Required for the Site to function (e.g., session management, security).
- Analytics cookies: Help us understand how users interact with the Site (e.g., Google Analytics).
- Preference cookies: Remember your settings and choices.
- Marketing cookies: Used, with your consent, to deliver relevant content and track campaign effectiveness.

You may manage your cookie preferences through your browser settings or by using a cookie consent manager where available on our Site. Please note that disabling certain cookies may affect Site functionality. Tattva does not use cookie-based data for health-related targeting or profiling.

Do Not Track: We recognize browser-level Do Not Track (“DNT”) signals where feasible. At this time, our Site does not universally respond to all DNT signals, but we honor opt-out requests made through the mechanisms described in Section 9.

7. Data Security

Tattva implements reasonable and appropriate technical and organizational safeguards to protect your personal information against unauthorized access, disclosure, alteration, or destruction. These measures include encrypted data transmission (TLS/SSL), access controls, and regular security reviews.

Health and biometric data is stored with heightened access restrictions and, where technically feasible, encrypted at rest. No method of electronic transmission or storage is 100% secure. In the event of a data breach affecting your personal information, we will notify you as required by applicable state and federal law.

8. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, to maintain your account, comply with legal obligations, resolve disputes, and enforce our agreements. Specific retention periods include:

- Account and contact information: Retained for the duration of your relationship with Tattva Health Inc. and for up to five (5) years thereafter unless a longer period is required by law.
- Payment records: Retained for seven (7) years in accordance with financial record-keeping requirements.
- Health intake and program data: Retained for five (5) years following your last program participation, or longer if required by applicable regulations.
- Biometric and HRV data: Retained for up to three (3) years following the conclusion of your program participation, in alignment with applicable biometric data privacy standards, including the Illinois Biometric Information Privacy Act (BIPA). You may request earlier deletion at any time as described in Section 9 below.

You may request deletion of your personal information at any time as described in Section 9 below.

9. Your Privacy Rights

Depending on your location and applicable law, you may have the following rights with respect to your personal information:

- Right to Know / Access: Request a copy of the personal information we hold about you and how we use it.
- Right to Correct: Request correction of inaccurate or incomplete personal information.
- Right to Delete: Request deletion of your personal information, subject to certain legal exceptions.
- Right to Portability: Request a structured, machine-readable copy of your personal data.
- Right to Opt Out of Sale or Sharing: We do not sell your personal information. If this practice ever changes, you will have the right to opt out.
- Right to Opt Out of Targeted Advertising: You may request that we stop using your information for targeted advertising purposes.
- Right to Restrict or Object to Processing: In certain circumstances, you may request that we limit or stop processing your personal information.

- **Right to Withdraw Consent:** Where processing is based on your consent, you may withdraw consent at any time without affecting the lawfulness of processing prior to withdrawal.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any privacy rights.
- **Right to Appeal:** If we deny your request, you may appeal our decision by replying to our denial.

To exercise any of these rights, please contact us at hello@tattva.health or at the address in Section 14. We may need to verify your identity before processing your request. We will respond within the timeframe required by applicable law (generally 30–45 days, with extensions where permitted).

You may designate an authorized agent to submit requests on your behalf. We will require written proof of authorization before processing agent-submitted requests.

10. State-Specific Privacy Rights

10.1 California Residents (CCPA/CPRA):

If you are a California resident, you have additional rights under the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”), including the rights described in Section 9 above. California residents may also request a list of third parties with whom we have shared personal information for direct marketing purposes in the preceding calendar year. To submit a request, contact us at hello@tattva.health.

10.2 Virginia, Colorado, Connecticut, Texas, and Other U.S. State Residents:

Residents of Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), Texas (TDPSA), and other states with applicable comprehensive privacy laws may have rights similar to those described in Section 9. We will honor requests from residents of these states in accordance with applicable law. Sensitive data—including health information, biometric data, and genetic data—will be processed only with your explicit consent where required by applicable state law.

10.3 European Union and United Kingdom Residents:

If you are located in the European Union or United Kingdom, please contact us at hello@tattva.health to discuss how your data is handled in accordance with applicable law.

11. Children’s Privacy

Tattva’s Site and Services are not directed to, and are not intended for use by, individuals under the age of 18. We do not knowingly collect personal information from children under 18. If you are a parent or guardian and believe your child has provided us with personal information, please contact us immediately at hello@tattva.health. We will promptly delete any such information upon verified request.

12. International Users and Data Transfers

The Site is hosted on servers located in the United States. If you access the Site from outside the United States, your information will be transferred to and processed in the United States, which may not have data protection laws equivalent to your home country. By using the Site, you consent to this transfer.

For transfers of personal data from the EU or UK, Tattva will rely on Standard Contractual Clauses approved by the European Commission, adequacy decisions, or other legally recognized mechanisms.

13. Links to Third-Party Sites

Our Site may contain links to third-party websites, wearable device platforms, or digital health tools not controlled by Tattva. This Privacy Policy does not apply to those third-party sites. We encourage you to review the privacy policies of any third-party services you access in connection with Tattva's programs.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, applicable law, or our Services. We will notify you of material changes by posting a notice on our Site and, where required by law, by sending an email to the address associated with your account. The date of the most recent revision will always appear at the top of this Policy. Your continued use of the Site following notice of any changes constitutes your acceptance of the updated Policy.

15. Contact Us

If you have questions, concerns, or requests related to this Privacy Policy or our data practices, please contact our Privacy Officer:

By Mail: Tattva Health Inc. **Attn:** Privacy Officer, 3500 South Dupont Highway, Dover, DE 19901

Email: hello@tattva.health

We are committed to resolving privacy inquiries promptly and will respond within thirty (30) days of receipt, or within the timeframe required by applicable law.