

PRACTICE PRIVACY POLICY

1. INTRODUCTION. Grooming @ Golden Paws (“*Practice*,” “*we*,” “*us*,” or “*our*”) is a veterinary practice committed to protecting the privacy of our clients and their patients. This Privacy Policy describes the categories of personal information we collect about individuals who interact with our website (the “*Site*”) and use our services, how we use and share that information, your privacy rights, and how to contact us with questions or requests. This Privacy Policy does not apply to the personal information of our employees or job applicants, which is governed by separate policies available upon request. Please review this Privacy Policy carefully. By accessing or using our Site, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with its terms, please do not use the Site.

2. COLLECTION OF INFORMATION. We collect personal information in the following categories:

(a) Information You Provide Directly. We collect personal information that you voluntarily provide to us, including when you:

- Schedule or request an appointment through our online booking tool;
- Submit a contact form or inquiry through our website;
- Sign up for email communications, reminders, or newsletters;
- Participate in client experience surveys or provide reviews; or
- Otherwise communicate with us through our website or in person.

The categories of personal information you may provide include your name, email address, phone number, mailing address, pet information, and any other information you choose to include in your communications with us, including health information about your pet.

(b) Information Collected Automatically. When you visit our Site, we and our service providers automatically collect certain information about your device and browsing activity, including:

- IP address and approximate geolocation (city/region level);
- Browser type and version;
- Operating system and device identifiers;
- Pages visited, links clicked, and time spent on pages;
- Referring website addresses and exit pages;
- Date and time of your visit;
- Other interaction data collected through cookies and similar tracking technologies;
- Call tracking numbers associated with our practice and records of inbound and outbound calls; and
- Call recordings, where permitted by applicable law.

This information is collected using cookies and similar tracking technologies, as described in Section 4 below. Please note that call tracking and recording practices vary by location and are implemented in accordance with applicable state law. Where call recording is active, you will be notified at the start of a call that it may be recorded for quality assurance and training purposes.

(c) Information from Third Parties. We may receive information about you from third parties, including analytics providers, advertising partners, and publicly available sources, which we may combine with information collected through the Site.

3. HOW WE USE PERSONAL INFORMATION. We use the personal information we collect for the following purposes:

- Operating and improving our website and veterinary services;
- Scheduling and managing appointments through our online booking tool;
- Sending appointment reminders, wellness notifications, and other communications via email, SMS, push notifications, and AI-powered calls (including through AVA Voice and AVA Outbound, each of which includes a recording acknowledgement at the start of any outreach call where applicable);
- Responding to your inquiries, requests, and communications;

- Conducting client experience surveys and requesting reviews to improve our services;
- Sending you information about our services and updates, where you have requested or consented to receive such communications;
- Conducting analytics to understand how visitors use our website and to improve user experience;
- Complying with applicable legal obligations and regulatory requirements;
- Protecting our rights, property, and the safety of our clients and the public; and
- Detecting, investigating, and preventing fraudulent, harmful, or unauthorized activity.

4. COOKIES AND TRACKING TECHNOLOGIES. Our Site uses cookies and similar technologies to collect information about your browsing activity. Cookies are small text files stored on your device by a website server. They are used to remember your preferences, analyze Site traffic, and support certain Site functionality.

(a) Categories of Cookies We Use

- Strictly Necessary Cookies: Required for the Site to function properly. These cookies cannot be disabled.
- Functional Cookies: Enable enhanced functionality and personalization, such as remembering your preferences.
- Analytics and Performance Cookies: Help us understand how visitors interact with the Site by collecting aggregated, anonymized data. We may use third-party analytics tools, including Google Analytics, for this purpose.
- Marketing and Advertising Cookies: Used to deliver relevant content and track the effectiveness of our communications. These cookies may be set by third-party advertising partners.

(b) Your Cookie Choices. You can control cookies through your browser settings. Most browsers allow you to refuse cookies or alert you when cookies are being sent. However, disabling certain cookies may affect Site functionality.

5. SMS COMMUNICATIONS AND 10DLC COMPLIANCE. By opting in to receive SMS messages from us, you (i) confirm that you are the owner or authorized user of the phone number provided and that you are at least 18 years old, and (ii) agree to the following terms:

(a) SMS Messaging Service. By providing your mobile phone number and consenting to receive text messages, you agree to receive SMS communications from us, including appointment reminders, wellness notifications, updates, and other relevant content related to your pet's care.

(b) Message Frequency and Data Rates. Message frequency varies based on your preferences and appointment schedule. Message and data rates may apply based on your mobile carrier's terms.

(c) Opt-Out Instructions. You may opt out of SMS communications at any time by replying STOP to any text message. You may also contact us at the email address in Section 13 below. For help, reply HELP to any text message.

(d) Liability and Privacy. We are not responsible for any charges, errors, or delays in SMS delivery caused by your carrier or third-party service providers. Your information will be handled in accordance with this Privacy Policy.

6. HOW WE SHARE PERSONAL INFORMATION. We do not sell or share your personal information for cross-context behavioral advertising purposes, as those terms are defined under applicable law. We may share your personal information in the following circumstances:

(a) Service Providers. We share personal information with third-party service providers that perform services on our behalf, such as website hosting, online booking and appointment management, mobile application services, client communication platforms, call tracking and recording services, analytics, email and SMS communications, and IT support. These service providers are contractually required to use your personal information only to provide services to us and to maintain the confidentiality and security of your information. Third-party service providers we use may

include PetDesk (mobile app and online booking) and AVA Voice/AVA Outbound (AI-powered client communications). These providers operate under their own privacy policies with respect to data they independently collect.

(b) Shared Infrastructures. We may share personal information with related entities and service partners for purposes consistent with this Privacy Policy or to operate shared infrastructure, systems, and technology.

(c) Business Transfers. We may share or transfer personal information in connection with a merger, acquisition, reorganization, sale of assets, or other corporate transaction, or in the event of bankruptcy or dissolution. We will notify you of any such change as required by applicable law.

(d) Legal Obligations and Safety. We may disclose personal information if we believe in good faith that disclosure is necessary to: (i) comply with applicable law or legal process, including responding to subpoenas or government requests; (ii) enforce our terms of use or other agreements; or (iii) protect the rights, property, or safety of the Practice, our users, or the public.

(e) Professional Advisors. We may share personal information with our lawyers, accountants, and other outside professional advisors in the ordinary course of business.

(f) With Your Consent. We may share personal information for other purposes with your consent or at your direction.

7. DATA RETENTION. We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. Retention periods vary depending on the category of personal information and the purposes for which it was collected. When personal information is no longer needed, we take reasonable steps to securely delete or de-identify it.

8. SECURITY. We implement and maintain reasonable administrative, technical, and physical safeguards designed to protect your personal information against unauthorized access, use, disclosure, alteration, or destruction. Our Site uses industry-standard encryption protocols for the transmission of personal information. No security measures are perfect or impenetrable. We cannot guarantee that unauthorized parties will never be able to defeat our security measures. In the event of a data breach affecting your personal information, we will notify you as required by applicable law.

9. YOUR PRIVACY RIGHTS. Depending on where you reside, you may have certain rights regarding your personal information. We extend the following rights to all Site visitors regardless of location:

(a) Right to Know / Access. You have the right to request that we disclose the categories and specific pieces of personal information we have collected about you, the categories of sources from which it was collected, the purposes for which it was collected, and the categories of third parties with whom it has been shared.

(b) Right to Correct. You have the right to request that we correct inaccurate personal information that we maintain about you.

(c) Right to Delete. You have the right to request that we delete personal information we have collected about you, subject to certain exceptions under applicable law.

(d) Right to Opt-Out of Sale or Sharing. We do not sell or share personal information for cross-context behavioral advertising purposes. If this practice changes, we will update this Privacy Policy and provide an opt-out mechanism.

(e) Right to Non-Discrimination. We will not discriminate against you for exercising any of your privacy rights.

(f) How to Submit a Request. To submit a privacy rights request, please complete our online request form at [data deletion request](#). We will respond to your request within 45 days of receipt. If we need additional time (up to 90 days total), we will notify you of the reason and extension period in writing. We may ask you to verify your identity before processing your request.

(g) Right to Appeal. If we decline to act on your request, you may appeal our decision by submitting a request via the online request form linked in Section 9(f) above, or by contacting us at the email set forth in Section 13 below, with "Privacy Appeal" in the subject line. We will respond to your appeal within 45 days of receipt. Colorado, Virginia, and Connecticut residents whose appeals are denied may contact their respective state Attorney General for further assistance.

(h) Authorized Agents. You may designate an authorized agent to submit requests on your behalf. We will require written proof of authorization and may still ask you to verify your identity directly with us.

10. CHILDREN'S PRIVACY. Our Site is not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13. If we become aware that we have collected personal information from a child under 13 without verifiable parental consent, we will take steps to delete that information. If you believe we may have collected personal information from a child under 13, please contact us at the email set forth in Section 13 below.

11. THIRD-PARTY WEBSITES. Our Site may contain links to third-party websites and services. This Privacy Policy does not apply to those third-party websites, which have their own privacy policies. We are not responsible for the privacy practices or content of any third-party websites, and links to such websites are not endorsements.

12. CHANGES TO THIS PRIVACY POLICY. We reserve the right to update this Privacy Policy at any time. The "Last Updated" date at the top of this Privacy Policy reflects when it was last revised. Material changes will be communicated by posting a notice on our Site or, where required by applicable law, by notifying you directly. We encourage you to review this Privacy Policy periodically.

13. CONTACT US. If you have questions or concerns about this Privacy Policy or our privacy practices, please contact us at mitch@groomgp.com.