



PRIVACY POLICY

BrainSMART Lifestyle Companion

Effective Date: June 25, 2026

Last Updated: June 25, 2026

1. Introduction

Welcome to BrainSMART Lifestyle Companion ("BrainSMART", "we", "our", or "us").

BrainSMART Lifestyle Companion is a wellness and lifestyle application designed to help users make informed decisions about their health and daily habits through assessments, personalized recommendations, healthy lifestyle guidance, shopping suggestions, product recommendations, and educational content.

We are committed to protecting your privacy and safeguarding your personal information. This Privacy Policy explains how we collect, use, disclose, store, and protect information when you use the BrainSMART Lifestyle Companion mobile application, website, and related services (collectively, the "Services").

By accessing or using the Services, you acknowledge that you have read and understood this Privacy Policy.

2. Important Notice Regarding Medical Advice

BrainSMART Lifestyle Companion is intended for informational, educational, and wellness purposes only.

The Services:

- Do not provide medical diagnosis.
- Do not replace professional medical advice.
- Do not establish a physician-patient relationship.
- Should not be used for emergency medical situations.

Users should always consult qualified healthcare professionals regarding medical concerns, diagnoses, or treatment decisions.

If you believe you are experiencing a medical emergency, call 911 or your local emergency services immediately.

3. Information We Collect

A. Information You Provide Directly

We may collect information you voluntarily provide, including:

Account Information

- Full name
- Username
- Email address
- Phone number
- Password credentials

Personal Information

- Age
- Date of birth
- Gender
- Lifestyle information
- Wellness goals
- Dietary preferences
- Exercise habits

Health and Wellness Information

You may voluntarily provide information such as:

- Health history
- Medical conditions

- Symptoms
- Medication information
- Weight and body metrics
- Sleep patterns
- Activity levels
- Nutrition information
- Wellness assessments
- Cognitive health information
- Mental wellness questionnaires
- Brain health assessments

Location Information

- City and state/province
- GPS location (with permission)
- Device location data

User-Generated Content

- Survey responses
 - Quiz answers
 - Feedback submissions
 - Notes and journal entries
 - Uploaded content
-

B. Information Collected Automatically

When you use the Services, we may automatically collect:

- Device identifiers
 - Device type
 - Operating system
 - Browser type
 - App version
 - IP address
 - Language settings
 - Usage analytics
 - Log information
 - Crash reports
 - Session information
-

C. Shopping and Recommendation Data

To provide personalized recommendations, we may collect and analyze:

- Product interests
 - Shopping preferences
 - Nutrition preferences
 - Purchase intent information
 - Recommended product interactions
 - Saved shopping lists
 - Wellness goals
-

4. How We Use Information

We may use collected information to:

Provide Services

- Create and manage accounts
- Deliver personalized wellness recommendations
- Generate healthy habit suggestions
- Create shopping lists
- Recommend products and services
- Improve user experience

Improve the Platform

- Analyze app performance
- Conduct research and analytics
- Improve recommendation algorithms
- Develop new features

Communications

- Send account notifications
- Provide customer support
- Respond to inquiries
- Send updates and service notices

Legal and Security Purposes

- Detect fraud

- Prevent unauthorized access
 - Protect users and systems
 - Comply with legal obligations
-

5. HIPAA Compliance

To the extent BrainSMART acts as a Business Associate or handles Protected Health Information ("PHI") on behalf of covered entities under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), we maintain administrative, physical, and technical safeguards designed to protect PHI.

These safeguards may include:

- Encryption of data in transit
- Encryption of data at rest
- Access controls
- Role-based permissions
- Audit logging
- Security monitoring
- Employee confidentiality obligations
- Incident response procedures

Where required by law, we will execute Business Associate Agreements (BAAs) with applicable covered entities.

Users should note that HIPAA applies only in specific circumstances defined by law. Not all information submitted to BrainSMART may constitute PHI under HIPAA.

6. Legal Basis for Processing

Depending on your location, we process information based on:

- Your consent
 - Performance of a contract
 - Legitimate business interests
 - Compliance with legal obligations
 - Protection of vital interests
-

7. Sharing of Information

We do not sell personal information.

We may share information with:

Service Providers

Third-party vendors that assist with:

- Cloud hosting
- Data storage
- Analytics
- Customer support
- Security monitoring
- Email delivery
- Payment processing

These providers may only access information necessary to perform services on our behalf.

Healthcare or Wellness Partners

Where authorized by you or required by law.

Legal Requirements

We may disclose information if required to:

- Comply with legal obligations
- Respond to court orders
- Protect safety
- Prevent fraud
- Defend legal rights

Business Transactions

If BrainSMART is involved in a merger, acquisition, financing, or asset sale, information may be transferred as part of that transaction.

8. Artificial Intelligence and Recommendation Systems

BrainSMART may use automated systems, algorithms, machine learning technologies, and artificial intelligence tools to generate:

- Lifestyle recommendations
- Health habit suggestions
- Wellness insights
- Product recommendations
- Shopping lists

These recommendations are informational only and should not be considered medical advice.

Users remain responsible for evaluating recommendations before acting upon them.

9. Data Retention

We retain information only as long as necessary to:

- Provide services
- Meet contractual obligations
- Comply with legal requirements
- Resolve disputes
- Enforce agreements

Retention periods may vary based on the type of information and applicable legal requirements.

10. Security Measures

We implement commercially reasonable safeguards including:

- Encryption
- Access controls
- Authentication measures
- Secure infrastructure
- Network monitoring
- Security testing
- Data backup procedures

However, no method of transmission or storage can be guaranteed to be 100% secure.

11. Your Privacy Rights

United States Privacy Rights

Depending on your state of residence, including California and other states with privacy laws, you may have rights to:

- Access your information
- Correct inaccurate information
- Delete personal information
- Receive information about data use
- Opt out of certain data sharing activities
- Appeal privacy-related decisions

Canadian Privacy Rights

Canadian users may have rights under applicable privacy laws, including PIPEDA, to:

- Access personal information
- Correct inaccurate information
- Withdraw consent where applicable
- Request information about data handling practices

Requests may be submitted using the contact information below.

12. Cookies and Tracking Technologies

We may use:

- Cookies
- SDKs
- Analytics tools
- Device identifiers
- Similar technologies

These technologies help improve functionality, performance, and user experience.

Users may manage certain tracking preferences through device settings.

13. Children's Privacy

BrainSMART is not intended for children under the age of 13.

We do not knowingly collect personal information from children under 13 without appropriate parental consent.

If we become aware that information from a child has been collected improperly, we will take reasonable steps to delete it.

14. International Data Transfers

Information may be processed and stored in the United States, Canada, or other jurisdictions where our service providers operate.

Where required, we implement appropriate safeguards for international data transfers.

15. Third-Party Products and Recommendations

The Services may provide recommendations for products, services, supplements, foods, wellness programs, or retailers.

BrainSMART does not guarantee:

- Product effectiveness
- Product safety
- Medical suitability
- Availability of products

Users should independently evaluate products before purchase or use.

16. Do Not Track Signals

Some browsers support "Do Not Track" signals. Because there is no universally accepted standard, our Services may not respond to such signals.

17. Changes to this Privacy Policy

We may update this Privacy Policy from time to time.

Changes become effective when posted within the Services.

Material changes may be communicated through the application, website, email, or other appropriate means.

18. Contact Information

If you have questions regarding this Privacy Policy or our privacy practices, please contact:

BrainSMART Lifestyle Companion

Privacy Officer

Email: lesliewilliamson11@gmail.com

Phone: (603) 276-9478

Mailing Address: 32 Schooner Drive. Dover, NH 03820

19. California Privacy Notice

For California residents, we may collect identifiers, internet activity information, health-related information voluntarily provided by users, location information, and commercial information necessary to operate the Services.

California residents may request:

- Access to collected information
- Deletion of information
- Correction of information
- Information regarding disclosures

We do not sell personal information.

20. Consent

By creating an account, submitting information, completing assessments, or using the Services, you consent to the collection, use, storage, and disclosure of information as described in this Privacy Policy.

If you do not agree with this Privacy Policy, please discontinue use of the Services.

GDPR

6. Legal Basis for Processing Personal Data (GDPR)

If you are located in the European Economic Area (EEA), United Kingdom, or Switzerland, we process your personal data only when we have a lawful basis to do so.

The lawful bases we rely on may include:

Consent

We process health-related information, wellness information, and other sensitive personal information based on your explicit consent.

You may withdraw your consent at any time, although this may affect our ability to provide certain Services.

Performance of a Contract

Processing necessary to provide the Services you request, including account creation, wellness assessments, recommendations, shopping lists, and personalized content.

Legitimate Interests

Processing necessary for:

- Improving our Services
- Preventing fraud
- Maintaining security
- Conducting analytics
- Enhancing user experience

We only rely on legitimate interests where such interests do not override your rights and freedoms.

Legal Obligations

Processing necessary to comply with applicable laws, regulations, court orders, and legal requirements.

11. GDPR and International Privacy Rights

If you are located in the European Economic Area (EEA), United Kingdom, or Switzerland, you have the following rights under applicable data protection laws:

Right of Access

You may request a copy of the personal data we hold about you.

Right to Rectification

You may request correction of inaccurate or incomplete personal information.

Right to Erasure ("Right to be Forgotten")

You may request deletion of your personal information in certain circumstances.

Right to Restrict Processing

You may request that we limit how we use your personal information.

Right to Data Portability

You may request a copy of your personal information in a structured, commonly used, machine-readable format.

Right to Object

You may object to certain processing activities, including processing based on legitimate interests.

Right to Withdraw Consent

Where processing is based on consent, you may withdraw that consent at any time.

Right Not to be Subject to Automated Decision-Making

You may request human review of decisions that significantly affect you and are based solely on automated processing.

Right to Lodge a Complaint

You may file a complaint with your local data protection authority if you believe your rights have been violated.

Requests regarding these rights may be submitted using the contact information provided in this Privacy Policy.

We will respond within the timeframes required by applicable law.

14. International Data Transfers

BrainSMART Lifestyle Companion may process and store information in the United States, Canada, and other countries where our service providers operate.

Where personal data originating from the EEA, United Kingdom, or Switzerland is transferred internationally, we implement appropriate safeguards, which may include:

- Standard Contractual Clauses approved by the European Commission
- UK International Data Transfer Agreements
- Data Processing Agreements with service providers
- Additional technical and organizational safeguards where appropriate

These measures are intended to provide a level of protection equivalent to that required under applicable data protection laws.

21. Special Category Health Information (GDPR)

Because BrainSMART Lifestyle Companion processes information relating to health, wellness, lifestyle habits, symptoms, and health assessments, certain information may be classified as Special Category Personal Data under Article 9 of the General Data Protection Regulation (GDPR).

We process such information only when:

- You provide explicit consent;
- Processing is necessary to provide requested wellness services;
- Processing is otherwise permitted by applicable law.

We implement enhanced safeguards for health-related information, including:

- Encryption of health data in transit and at rest;
- Access controls and authentication measures;
- Security monitoring and auditing;
- Employee confidentiality obligations;
- Data minimization practices;
- Regular security reviews.

Health-related information is only used for the purposes described in this Privacy Policy and is not sold to third parties.

22. Data Protection Officer

Where required by applicable law, BrainSMART Lifestyle Companion will designate a Data Protection Officer ("DPO") or responsible privacy representative.

Privacy inquiries may be directed to:

Data Protection Officer
BrainSMART Lifestyle Companion
Email: lesliewilliamson11@gmail.com

23. Automated Profiling and Personalized Recommendations

BrainSMART Lifestyle Companion uses automated processing, algorithms, machine learning technologies, and artificial intelligence systems to analyze information you provide and generate:

- Lifestyle recommendations
- Healthy habit suggestions
- Shopping lists
- Product recommendations
- Wellness insights

These recommendations are intended to support user decision-making and are not intended to replace professional medical advice.

Users may request additional information regarding automated processing activities and may object to certain forms of automated processing where permitted by law.

24. EU Representative (If Applicable)

If BrainSMART Lifestyle Companion offers services to individuals located within the European Union and does not maintain an establishment within the European Union, an authorized EU Representative may be appointed as required by Article 27 of the GDPR.

Representative details will be published here once appointed.