HealthTronics, LLC Privacy Policy for California Residents

Effective Date: January 1, 2020

Last Reviewed and Updated: December 1, 2025

This Privacy Policy for California Residents applies solely to individuals who reside in the State of California ("consumers" or "you"). We adopt this Privacy Policy to comply with the California Consumer Privacy Act of 2018, which is Title 1.81.5 of the California Civil Code (as amended, "CCPA"), the regulations adopted by the California Privacy Protection Agency thereunder, and other California privacy laws.

Any terms defined in the CCPA have the same meaning when used in this Privacy Policy. For example, under the CCPA, the terms "share," "shared," or "sharing" have a specialized meaning that refers specifically to sharing for "cross-context behavioral advertising." California Civil Code Section 1798.140(ah).

The term "consumers" is broadly defined by the CCPA and includes, among others, our employees and physician partners residing in California, as well as customers and other business contacts located in California.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device ("personal information").

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	**Example**	**Collected**
A. Identifiers	A real name, alias, postal address, unique personal	Yes

	identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other	Yes

	purchasing or consuming histories or tendencies.	
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Yes (photographs and/or height, hair and eye color)
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data	Physical location or movements	Yes
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	Yes
I. Professional or employment-related information	Current or past job history or performance evaluations	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No

K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from California residents.
- Indirectly from California residents. For example, through information we collect from our sales force.
- Directly from activity on one of our websites (www.healthtronics.com or kidney-stone-relief.com), such as from submissions through the "Contact Us" or "Schedule an Appointment" form or submissions of e-mail addresses to sign up to receive e-mail alerts.
- From third parties that interact with us in connection with the services we perform or equipment or products that we provide. For example, from third party marketing vendors who sell us customer lists.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

Category A, B & D:

- To fulfill or meet the reason for which the information is provided. For instance, if you provide us with personal information in order to request more information, we will use your personal information to send you the information. And if a physician partner provides us with personal information for purposes of a partnership investment, we will use the personal information for partnership-related matters, including compliance with federal and state securities laws and other laws applicable to partnerships, communicating with the physician partner regarding partnership matters, processing partnership-related transactions, sending partnership distributions, preparing partnership-related tax documents and providing information about other business opportunities, such as other types of partnerships (for example, if you are invested in a shockwave lithotripsy partnership we may also provide you information about a laser partnership opportunity or a consumables partnership opportunity).
- To carry out our obligations and enforce our rights in the context of our employer-employee relationships.

- To assist in the administration of payroll and benefits programs.
- To facilitate the credentialing of employees at health care facilities.
- To provide, support, personalize, and develop our services as well as equipment and products we provide.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries.
- To assist in tax preparation.
- To carry out our obligation and enforce our rights arising from any contracts entered with you or related organizations, including for billing and collections.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, financing or refinancing, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Category C, E, F, G & H:

- To carry out our obligations and enforce our rights in the context of our employer-employee relationships.

Category I:

- To carry out our obligations and enforce our rights in the context of our employer-employee relationships.
- To facilitate the credentialing of employees at health care facilities.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosing, Sharing or Selling Personal Information

We may disclose your personal information to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business or commercial purpose:

Category A: Identifiers

Category B: California Customer Records personal information categories

Category C: Protected classification characteristics under California or federal Law

Category D: Commercial information

Category E: Biometric information (photographs and/or height, hair and eye color)

Category I: Professional or employment-related information

We disclose our personal information for a business purpose to the following categories of third parties:

- Our affiliates
- Service providers

In the preceding twelve (12) months, we have not shared any personal information and we have not sold any personal information.

We do not and will not sell personal information while this Privacy Policy is in effect. Also, we only collect or process sensitive personal information without the purpose of inferring characteristics of any consumer.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive and confirm your identity, we will disclose to you:

- The categories of personal information we collected about you.

- For each category of personal information we collected about you:

  (1) the categories of sources for the personal information we collected about you;

  (2) the categories of third parties with whom we share that personal information;

  (3) our business or commercial purpose for collecting or disclosing that personal information (and for any disclosures, we will identify the personal information categories that each category of recipient obtained); and

  (4) and the specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive and confirm your identity, we will delete your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code Section 1546 seq.).

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

- Comply with a legal obligation.

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request to us by either:

- E-mailing our Privacy Officer, Clint Davis, at Clint.Davis@HealthTronics.com

- Visiting https://www.healthtronics.com/contact/, scrolling down to "How can we help?", selecting the drop down category under "Subject" entitled, "Request Under California Privacy Act" and submitting your request

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will confirm receipt of your request within 10 business days. If you do not receive confirmation within the 10-day timeframe, then please contact our Privacy Officer, Clint Davis, at Clint.Davis@HealthTronics.com or (512) 721-4748.

We endeavor to substantively respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days total), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, on the basis of exercising any of your CCPA rights we will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Provide you a different level or quality of goods or services
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Policy

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated policy on our website (www.healthtronics.com) and the Privacy Policy will state the date that it was last updated.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: Please call (512) 721-4748 to speak with Clint Davis, our Privacy Officer
Website: Please visit https://www.healthtronics.com/contact/, scroll down to "How can we help?", select the drop down category under "Subject" entitled, "Request Under California Privacy Act" and submit your request
Email: Please send an e-mail to Clint Davis, our Privacy Officer, at Clint.Davis@HealthTronics.com
Postal Address: HealthTronics, LLC, 1990 Steam Way, Suite A102, Round Rock, Texas 78665, Attention: Clint Davis, Privacy Officer

If you need to access this Privacy Policy in an alternative format due to having a disability, please contact us by any of the methods listed above.