



A Digitally-Driven Healthcare & Lifestyle Company

8 Ennevor Close, Kingston 10, Jamaica

Email: privacy@karekapitalgroup.com

PRIVACY POLICY

Kare Kapital Group Ltd. (hereinafter referenced as “Kare Kapital Group,” “we,” “our,” “us”), formerly **KaciKare Medical Services Ltd.**, is a telemedicine and lifestyle wellness company providing virtual and in-home clinical services, digital health platforms, and related wellness solutions under our brands Klick2Kare, Reset2Glow, and any future Kare Kapital products or services.

Protecting the privacy and security of our patients, clients, professionals, employees, and platform users is fundamental to our mission. This Privacy Policy explains what personal information we collect, how and why we use it, who we share it with, your rights, and how we protect and retain that information, including how we handle international transfers and sensitive health data.

This Policy applies to all Kare Kapital Group services worldwide and supplements any jurisdiction-specific notices that may be provided when using a particular Service.

Scope of this Privacy Policy

This Privacy Policy describes the types of personal information we collect from clients and users, how we use, maintain, share, and protect that information, and the rights and choices you may have. It covers personal data collected from our websites, mobile applications, patient portals, in-home and clinic intake forms, teleconsultation platforms, scheduling systems, marketing channels, call centers, HR systems, and any offline methods used to support our Services.

All information collected and stored by Kare Kapital Group or added by users into our secure platforms is treated as **Protected Health Information (PHI)** and/or medical information under applicable law, including the **Jamaica Data Protection Act (2020)**, the **U.S. Health Insurance Portability and Accountability Act (HIPAA)**, and relevant **Florida privacy laws**. We will not use or disclose your information for advertising, marketing, or data-mining purposes unless permitted by law or with your explicit consent.

1.0 Types of Personal Information We Collect

When using our systems or engaging our services, you may provide certain information about yourself. Kare Kapital Group and its trusted partners may also automatically collect information using cookies and similar technologies. This may include:

- **Identity & Contact Data:** Name, date of birth, national ID/passport, address, email, telephone, emergency contact.
- **Health & Clinical Data:** Medical history, symptoms, diagnoses, medications, lab results, clinical notes, imaging, prescriptions, allergies, family medical history, mental health information.
- **Account & Authentication Data:** Usernames, passwords, multi-factor authentication, security questions, device identifiers.
- **Payment & Billing Data:** Payment details, billing address, insurance identifiers, claim information.
- **Usage & Technical Data:** IP address, device and operating system information, app usage logs, session metadata, crash reports.
- **Communications:** Messages to/from clinicians, appointment notes, call recordings, and other correspondence.



- **Marketing & Profiling:** Preferences, marketing opt-ins/opt-outs, and analytics data for service improvement.
- **Employment & Contractor Data:** For staff and contractors, including background checks, payroll, and credentialing information.

2.0 How We Collect Personal Information

We may collect information:

- Directly from you through forms, inquiries, platform activities, and registrations.
- From healthcare professionals or referring providers.
- Through automated technologies and tracking tools.
- From authorized legal guardians or partners.
- From approved third-party organizations.
- From publicly available sources.

3.0 How We Use Your Information

Kare Kapital Group may use your information to:

- Operate, maintain, and improve our websites, apps, and digital platforms.
- Provide and enhance clinical care, prescriptions, diagnostics, teleconsultations, referrals, and logistics.
- Manage accounts, appointments, billing, payments, and insurance claims.
- Communicate appointment reminders, test results, and clinically relevant alerts.
- Conduct research and analysis for service development and quality assurance.
- Deliver personalized and user-friendly experiences.
- Send service updates, health alerts, or promotional communications (where permitted).
- Comply with legal, regulatory, and public-health requirements.
- Fulfill any other purpose with your consent.

4.0 How We Share Your Information

Your information may be shared in limited, lawful circumstances:

- **Vendors & Service Providers:** Hosting, analytics, advertising, technology, and data security partners.
- **Healthcare Providers:** Clinicians involved in your care, insurers, and claims verifiers.
- **Affiliates & Group Entities:** Within the Kare Kapital Group family for operations and administration.
- **Regulators & Authorities:** When required by law, subpoena, or for public health reporting.
- **Public Health Bodies:** For disease control or emergency response.
- **Aggregate or De-Identified Data:** Shared for marketing, research, or similar purposes.
- **With Consent:** When you authorize sharing with third parties (e.g., linked social media).

If you choose to make personal information publicly available (for example, in a comment section), others may view and use that information.

5.0 Cookies & Tracking Technologies

We use cookies and tracking tools to operate our Services, analyze usage, and enhance functionality. Types of cookies include:

- **Essential Cookies** – Required for secure platform operation.
- **Analytical/Performance Cookies** – Help improve performance and usability.
- **Functionality Cookies** – Remember user preferences and settings.
- **Targeting Cookies** – Enable relevant advertising and content personalization.

You may disable or delete cookies in your browser settings; however, some features may not function properly.



6.0 Children's Privacy

Our Services are not directed to individuals under 18 years of age. We do not knowingly collect data from minors without verified parental consent. If such data is discovered, it will be deleted and the guardian notified in accordance with law.

7.0 Security Measures

We employ administrative, technical, and physical safeguards appropriate to the sensitivity of the data, including encryption, access controls, multi-factor authentication, secure coding, network segmentation, vulnerability testing, and continuous monitoring.

While we strive to protect your information, no internet or storage system can be guaranteed 100% secure. Users should safeguard their passwords and access credentials. Kare Kapital Group is not liable for unauthorized access resulting from user negligence or external breaches beyond our control.

8.0 Retention & Deletion

We retain personal information only as long as necessary to deliver services, meet contractual or legal requirements, resolve disputes, or pursue legitimate business purposes. Once information is no longer needed, it is securely deleted, archived, or anonymized.

9.0 International Data Transfers

Because Kare Kapital Group serves clients across borders, your data may be processed in other jurisdictions, including the United States. Transfers are made with appropriate safeguards under applicable laws (e.g., standard contractual clauses, adequacy determinations). By using our Services, you consent to such lawful transfers.

10.0 Your Privacy Rights

Depending on your jurisdiction, you may have the right to:

- Access and receive a copy of your personal information.
- Correct or update inaccurate data.
- Request deletion of your information (*conditions apply*)
- Restrict or object to processing.
- Request data portability.
- Withdraw consent (where processing is consent-based).
- Opt out of the sale or sharing of personal information (where applicable).
- Not be discriminated against for exercising your rights.

To exercise any of these rights, contact us at privacy@karekapitalgroup.com. We will respond as required by applicable law.

11.0 Health-Specific & Telemedicine Provisions

- **Continuity of Care:** Clinical records may be shared among treating professionals when necessary.
- **Teleconsultation Recordings:** Sessions will be recorded for internal purposes for training and or legal requirements.
- **E-Prescribing & Controlled Substances:** Handled in accordance with local and international regulations.
- **Emergency Disclosures:** We may share health information without prior consent when required to prevent serious harm or protect life.

12.0 Breach Notification

In the event of a data breach affecting personal information, Kare Kapital Group will comply with all applicable breach notification laws, promptly inform affected individuals and regulators, and take corrective measures.



13.0 Changes to This Policy

We may update this Policy periodically to reflect changes in our practices, technology, or legal requirements. The revised Policy will include an updated "Effective Date." Where required by law, we will provide direct notification.

14.0 Contact Us

Kare Kapital Group Ltd

(Formerly KaciKare Medical Services Ltd.)

8 Ennevor Close, Kingston 10, Jamaica

Email: privacy@karekapitalgroup.com

All inquiries, complaints, or privacy requests, whether originating in Jamaica, the United States, or elsewhere, should be directed to this address and email.

15.0 Disclaimer

This Privacy Policy is provided for informational purposes and does not constitute legal advice. Kare Kapital Group Ltd. recommends consulting a qualified legal professional to ensure compliance with your specific jurisdiction.

16.0 Acknowledgement & Consent

By using Kare Kapital Group Ltd. Services, you acknowledge that you have read, understood, and consent to the collection, processing, transfer, storage, and use of your personal information as described in this Privacy Policy.

