

Consumer Health Data Privacy Policy

Effective Date: October 19, 2026

FitX Brands Inc. provides this notice for consumer health data covered by Washington's My Health My Data Act. It describes our collection and use, recipients, and how to exercise applicable rights. Ordinary personal information is addressed in our general [Privacy Policy](#).

Information sources and purposes

Covered information may include answers about orthotics, foot symptoms or physical conditions, health-related fit feedback, and any scan information or derived fit information that identifies a physical condition or otherwise meets the Act's definition. Contact details and account identifiers used to link these records are included where covered.

We receive this information from you, the Volumental scanning service, and our analysis of the information you provide. We use it to provide your requested fitting service, personalize and make footwear, assess fit, provide fit support, and handle remakes. We also use session recordings of the free-scan fit questions on fitxlab.com, which show the answers you select, to find and fix problems and improve those questions.

Where the law requires consent, we obtain it before collection or sharing. Collection or processing necessary to provide a product or service you request is assessed under the applicable statutory exception. Additional uses for product improvement require an appropriate legal basis, such as specific consent or use of data that meets the applicable deidentification standard. On fitxlab.com, continuing past the first free-scan fit question is your agreement to this notice, our Terms of Service, and our Privacy Policy, including the session recording of those questions; if you do not agree, do not continue.

Information recipients

Volumental processes scanning data, Google Cloud supports storage and processing, and our fit, grading, and recommendation systems use relevant records to provide the fit service. Microsoft email and Teams support review by our authorized fit team; Postmark delivers those review emails, including a copy to a Google Gmail mailbox our team uses for testing. PostHog, our analytics provider, processes session recordings of the free-scan fit questions on fitxlab.com on our behalf, which show the answers you select, unless you have turned optional Analytics off, once you have continued past the first of those questions; PostHog may use them only to provide that service to us, under terms consistent with this policy. Manufacturing and fulfillment providers receive covered information only to the extent necessary to make and deliver your requested product, under appropriate terms.

We do not share covered health data with advertising platforms or marketing-message systems, and we do not sell it. We do not share it with corporate affiliates. If a provider processes covered

data on our behalf, its processing must be consistent with our instructions, applicable law, and the disclosed service purpose.

If a covered disclosure to an independent third party is not within a lawful exception, we obtain any distinct sharing consent required by the Act.

Your rights and requests

Email hello@fitxlab.com with your account email and request. You may request confirmation and access, including information about recipients; withdraw applicable collection or sharing consent; or request deletion of covered health data. We will provide the required recipient list and contact routes in response to an access request. We verify identity using commercially reasonable means, without requiring a new account.

We respond without undue delay and within 45 days of receipt. Where the law permits one additional 45-day period, we explain the extension within the initial period. Required deletion covers our records and the required notices to recipients and processors. For archived or backup data, any legally permitted delay will not exceed six months after authentication. General order-record retention language does not override these rights.

If we deny a request, you may appeal by replying to our decision. We will respond within 45 days with our reasons. If an appeal is denied, we will provide a route to submit a complaint to the Washington Attorney General at <https://www.atg.wa.gov/file-complaint>.

Requests and appeals can be handled through the same monitored inbox. You may also write to FitX Brands Inc., 600 N Broad Street, Suite 5-912, Middletown, DE 19709.