Consumer Health Data Privacy Policy

Effective Date: November 1, 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, the fit needs you type, say, or select before buying (such as bunions or hammer toes), voice recordings of those needs, the fit summary we prepare from them, questions you send our founders that include them, 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 (what you type, say, or select), the Volumental scanning service, and our analysis of the information you provide, including automated analysis that OpenAI may perform on our behalf. We use it to provide your requested fitting service, show before you buy how FitX may adjust the shoe for your fit needs, answer questions you send us, personalize and make footwear, assess fit, provide fit support, and handle remakes. We also use session recordings of the fit questions on fitxlab.com, which show the answers you select, to find and fix problems and improve those questions; we do not record the question "What do you need from your shoes?" or the fit summary and the form to ask a FitX co-founder that follow it.

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. Turning your voice recording into text when you use the microphone, and preparing the fit summary you ask for, are services you request. So is saving the fit needs you told us with the order you start at checkout, so that the people who make and review your pair can read them. If you do not complete that checkout, or you send your fit needs to our founders with a question, we keep a copy of this consumer health data (your fit needs and the summary you saw) with the email address you gave for 90 days so that we can follow up on that checkout or answer your question, then delete it; we delete it sooner if you request deletion or once you complete the purchase you told us your fit needs for. 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 of our fit questions is your agreement to this notice, our Terms of Service, and our Privacy Policy, including the session recording of those questions, and continuing past the question "What do you need from your shoes?" is your agreement to the same three documents; 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. OpenAI may process, on our behalf, the fit needs you type, say, or select before buying: it turns a voice recording into text you can check and edit, and it may read your words and selections to suggest which areas of the shoe to adjust, to write parts of the summary you see, and to suggest when a FitX co-founder should review your needs before you buy. OpenAI receives no name, email address, or account details from us. Under its terms with us, it may use this information only to provide its service, comply with law, enforce its policies, and prevent abuse, and may not use it to train its models; it may keep requests and its responses for up to 30 days to monitor for abuse, or longer where the law requires or where needed to protect its services or others from harm. FitX does not keep voice recordings. 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. Postmark also delivers questions you send a FitX co-founder, with your email address and any fit needs and summary sent with them, to our founders' mailbox, which Zoho Mail hosts; for a question sent with your fit needs, Microsoft Teams receives only a notice that a fit-needs question arrived, without your email address, your question, or your needs. PostHog, our analytics provider, processes session recordings of the 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 the email address or mobile number on your account, or the email address you used to send us a question, and your 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. We send OpenAI no name, email address, or account identifier with your fit needs and do not record its request identifiers, so we cannot match your requests there; under its terms with us, OpenAI keeps them only as described above. 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.