



Privacy Policy

Effective Date: May 31, 2026

ABOUT THIS POLICY. This Privacy Policy explains how Natal Health LLC collects, uses, and shares information about you and your enrolled child. Because Natal involves health and, where you elect genetic testing, genetic information about minors, we also maintain a separate Consumer Health Data Privacy Policy that provides additional disclosures and rights for residents of certain states. Both policies, together with the Membership User Agreement, govern your use of the Service.

1. Who We Are and Scope

This Privacy Policy (“Policy”) applies to information collected by Natal Health LLC (“Natal,” “we,” “us,” or “our”) through the website at joinnatal.com, any Natal mobile applications, and related services (collectively, the “Service”). It describes our practices as the operator of the Service.

The clinical components of the Service are provided by Everwell Neuro PLLC, an independent, physician-owned Texas professional limited liability company (the “Clinical Entity”), that orders laboratory testing and supervises result review. Health information created in the course of those clinical services may be protected health information (“PHI”) under the Health Insurance Portability and Accountability Act (“HIPAA”) and is handled in accordance with HIPAA and the agreements between Natal and the Clinical Entity. Where this Policy and HIPAA both apply to the same information, HIPAA governs that information to the extent it provides greater protection.

2. Information We Collect

2.1 Information You Provide

- **Account and contact information** — such as your name, email address, and password.
- **Child enrollment information** — such as your child’s name and the information contained in documentation you provide at enrollment, including date and time of birth and place of birth.
- **Uploaded documents** — such as a birth certificate or other records you submit through our intake process.
- **Payment information** — processed by our third-party payment processor. We do not store full payment card numbers.
- **Communications** — information you provide when you contact member support or otherwise communicate with us.

2.2 Health and Laboratory Information

When the Service includes laboratory testing, we and the Clinical Entity collect laboratory orders, specimen and accession information, laboratory results, and the interpretive content prepared for your child, such as result summaries and, where applicable, genetic testing narratives. This information is collected and handled as described in this Policy and the Consumer Health Data Privacy Policy.

N A T A L

joinnatal.com · Natal Health LLC, Austin, Texas
Natal Privacy Policy · Page 1



2.3 Information Collected Automatically

When you use the Service, we and our service providers may automatically collect device and usage information, such as IP address, device identifiers, browser type, pages viewed, and interactions with the Service, including through cookies and similar technologies. We do not use clinical or laboratory result data for advertising, and we do not permit third-party advertising trackers to access health information through the Service.

3. How We Use Information

- To provide, operate, and maintain the Service, including enrollment, laboratory ordering through the Clinical Entity, scheduling support, delivery of results and interpretive content, and developmental guidance;
- To process payments and manage your account and membership;
- To communicate with you about your account, orders, results, and service updates;
- To personalize the developmental guidance generated for your child within our proprietary framework;
- To maintain the security and integrity of the Service and prevent fraud and misuse;
- To improve and develop the Service, using de-identified or aggregated information wherever practicable; and
- To comply with legal obligations and enforce our agreements.

We do not sell your or your child's personal information, and we do not share it for cross-context behavioral advertising. We do not use a child's health information for any purpose other than providing the Service and as described in this Policy.

4. How the Developmental Guidance Uses Data and Artificial Intelligence

The developmental guidance component of the Service is generated using an artificial intelligence system within our proprietary interpretive framework. The data used to generate this guidance consists of developmental profile inputs derived from your child's date of birth, time of birth, and place of birth, together with the child's age. This developmental profile data is not protected health information.

Natal's developmental guidance system is designed so that laboratory and clinical result data are not used as inputs to the artificial intelligence system that generates developmental guidance. The developmental guidance pipeline and the laboratory results system are designed and maintained as separate pipelines. We contractually direct our AI service provider not to use information sent through the Service to train its general-purpose models.

5. How We Share Information

We share information only as described below. We do not sell personal information.



Recipient	Purpose
The Clinical Entity	To order laboratory testing, review results, and prepare clinical interpretive content under professional supervision.
Laboratories and reference laboratories	To perform the testing you elect. These independent laboratories receive the information necessary to perform and return testing, and handle it under their own obligations and applicable law.
Service providers and processors	Vendors that support the Service, such as hosting, secure file intake and storage, payment processing, scheduling, email delivery, and analytics. They may use information only to perform services for us and are bound by contractual confidentiality and, where they handle PHI, by Business Associate Agreements.
Artificial intelligence provider	To generate developmental guidance using non-clinical developmental profile data only, under terms that prohibit use of the data to train general-purpose models.
Legal and safety	When required by law, subpoena, or legal process, or to protect the rights, safety, and security of members, the public, or Natal.
Business transfers	In connection with a merger, acquisition, financing, reorganization, or sale of assets, subject to appropriate confidentiality protections.
With your direction	When you ask us to share information, such as sharing a result summary with your child's healthcare provider.

6. Service Providers Handling Sensitive Information

We rely on established third parties to deliver the Service. Service providers may include clinical laboratories and reference laboratories; secure file intake and storage providers operating under a Business Associate Agreement; payment processors; e-commerce and checkout providers; email delivery providers; analytics providers; and artificial intelligence providers used for non-clinical developmental guidance. Every vendor that handles protected health information is required to sign a Business Associate Agreement. The specific providers we use may change over time as the Service evolves.

7. Children's Information

The Service is designed for parents and legal guardians to enroll their minor children. We collect information about children only from the enrolling parent or guardian, who must have legal authority to provide it. We do not knowingly permit children to create their own accounts or to provide information directly through the Service.

We use a child's information solely to provide the Service for that child and as described in this Policy. We comply with the Children's Online Privacy Protection Act ("COPPA") and applicable state law regarding the information of minors. A parent or guardian may review, request changes to, or request deletion of their child's information as described in Section 9, subject to legal recordkeeping obligations that apply to clinical and laboratory records.

8. Data Security and Retention

NATAL



We maintain administrative, technical, and physical safeguards designed to protect information against unauthorized access, use, alteration, and destruction. Protected health information is encrypted in transit and at rest, access is limited on a need-to-know basis, and access to such information is logged. No method of transmission or storage is completely secure, however, and we cannot guarantee absolute security.

We retain information for as long as necessary to provide the Service, to comply with our legal, clinical, and laboratory recordkeeping obligations, to resolve disputes, and to enforce our agreements. Clinical and laboratory records, including genetic testing results, may be subject to retention periods required by law and professional standards, and may be retained for those periods even after you cancel your membership. When information is no longer required, we delete or de-identify it.

8.1 Incident Notification

In the event of a security incident involving personal information, Natal will investigate and will provide notice to affected individuals and to regulators as and when required by applicable law.

8.2 De-Identified and Aggregated Information

We may create, use, disclose, and retain de-identified and aggregated information for analytics, quality improvement, research, product development, benchmarking, and other lawful business purposes. We maintain such information in a form that is not reasonably capable of being associated with you or your child, commit to maintaining and using it only in de-identified or aggregated form, and do not attempt to re-identify it except as permitted by law to test our de-identification processes.

9. Your Privacy Rights and Choices

9.1 Account Information

You may review and update your account information at any time through your account or by contacting member support.

9.2 Rights That May Apply to You

Depending on your state of residence, you may have rights to request access to the personal information we hold about you, to request correction or deletion, to obtain a portable copy, to opt out of certain processing, and to be free from discrimination for exercising your rights. Because we do not sell personal information or use it for cross-context behavioral advertising, there is no such activity to opt out of. Residents of certain states also have additional rights regarding consumer health data and genetic information, which are described in our Consumer Health Data Privacy Policy.

9.3 How to Exercise Your Rights

You may exercise your rights by contacting Natal through the member support contact information at joinnatal.com. We will verify your request, respond within the timeframe required by applicable law, and may decline a request only to the extent permitted by law, including where clinical or laboratory recordkeeping obligations require us to retain information. You may use an authorized agent where the law permits, subject to verification.

N A T A L



9.4 Communications Preferences

You may opt out of non-essential marketing communications at any time using the unsubscribe link in those messages or by contacting us. We may still send you transactional and service messages necessary to administer your membership.

10. California Privacy Rights

If you are a California resident, the following applies in addition to the rest of this Policy.

10.1 Relationship Between CMIA, HIPAA, and the CCPA

Medical information created or maintained in connection with the clinical components of the Service is governed by the California Confidentiality of Medical Information Act (“CMIA”) and, where applicable, by HIPAA. To the extent the CMIA applies to and governs particular medical information, that information is handled under the CMIA rather than under the California Consumer Privacy Act. Information that is not governed by the CMIA or HIPAA, such as certain website and account information, is handled under the CCPA as described below. We handle medical information only with the authorization you provide at enrollment or as otherwise permitted by the CMIA, and we do not disclose it for purposes other than providing the Service except as the CMIA permits.

10.2 CCPA Rights

The California Consumer Privacy Act, as amended (“CCPA”), provides you with the rights described in Section 9, including the rights to know, access, correct, and delete personal information, to obtain a portable copy, and to limit the use and disclosure of sensitive personal information. Health information and genetic information are treated as sensitive personal information under the CCPA.

10.3 No Sale, No Sharing, Limited Use of Sensitive Information

Natal does not sell personal information and does not share personal information for cross-context behavioral advertising, as those terms are defined under the CCPA. We do not use or disclose sensitive personal information, including health and genetic information, for purposes other than those permitted under the CCPA and necessary to provide the Service. We do not use health information for advertising and do not permit advertising trackers to collect health information through the Service. California residents may exercise their rights as described in Section 9.3 and will not be discriminated against for doing so.

10.4 Minors

We do not sell or share the personal information of minors, and we apply heightened protections to the information of Enrolled Children as described in Section 7 and in the Consumer Health Data Privacy Policy.

11. Texas and Other State Privacy Rights

Natal is based in Texas. The Texas Data Privacy and Security Act and comparable comprehensive privacy laws in other states provide eligible residents with rights to access, correct, delete, and obtain a copy of their personal information, and to opt out of targeted advertising, sale, and certain profiling. Natal does not engage in the sale of personal information or in targeted advertising using



your information. Residents may exercise applicable rights as described in Section 9.3, and may appeal a decision regarding a request by contacting us, after which you may contact your state Attorney General if you have concerns about our response.

12. Consumer Health Data and Genetic Information

Residents of Washington, Nevada, Illinois, and certain other states have specific rights regarding consumer health data and genetic information. Those rights, the additional consents we obtain for genetic testing, and the separate Consumer Health Data Privacy Policy required by Washington law are described in the Natal Consumer Health Data Privacy Policy, which is available at joinnatal.com and is incorporated into this Policy by reference.

13. Cookies and Tracking Technologies

We and our service providers use cookies and similar technologies to operate the Service, remember your preferences, and understand usage. We do not use these technologies to collect health information for advertising. You can manage cookies through your browser settings, although disabling some cookies may affect the functioning of the Service. We honor recognized browser-based opt-out preference signals where required by law.

14. Third-Party Links

The Service may link to third-party websites and services that we do not control. This Policy does not apply to those third parties, and we encourage you to review their privacy policies.

15. Information Storage and Transfer

We store and process information in the United States. The Service is intended for residents of the United States and is not directed to individuals outside the United States. We do not sell or transfer genetic or other sensitive information in a manner prohibited by applicable law, and we restrict transfers of such information consistent with applicable federal and state requirements.

16. Changes to This Policy

We may update this Policy from time to time. When we make material changes, we will post the updated Policy at joinnatal.com with a new effective date and, where required, provide additional notice. Your continued use of the Service after the updated Policy becomes effective constitutes acceptance of the changes.

17. How to Contact Us

If you have questions about this Policy or our privacy practices, or wish to exercise your rights, please call or email us at help@drkimberlyidoko.com or contact us at 5900 Balcones Drive # 22815, Austin, TX, 78731, US. If you have an unresolved concern, you may also have the right to contact your state Attorney General or relevant regulator.



N A T A L