

PRIVACY POLICY

Privacy Policy of Wellness Within Your Walls, Inc. ("Wellness Within Your Walls," "WWYW," "we" or "us")

Respecting and protecting your privacy is very important to us. The following applies to the collection of information and data by Wellness Within Your Walls, its subsidiaries and affiliates via wellnesswithinyourwalls.com and interactions on our Facebook page and mobile applications such as our Instagram feed. If you have questions or concerns regarding this policy, you should contact WWYW at info@wellnesswithinyourwalls.com.

This privacy policy ("Policy") governs your use, access, and all interactions with the WWYW, any of WWYW services (the "Services"), the wellnesswithinyourwalls.com website, and any other website owned and operated by WWYW, or pages where this Policy is displayed and accessible (collectively, "Website"). (Together, the Website and Services are the "WWYW Program"). In this Policy we disclose the types of information we collect, how we use them and explain the choices you can make about the way your information is collected and used.

1. **Consent.** By using the WWYW Program you consent to our using and processing of your data as set forth in this Policy. Such consent includes any approvals needed to use your information in conjunction with Stripe, Google Analytics, and other service companies and partners we deem necessary for the continued operation of our business. Your continued use of the WWYW Program or continued interaction with us after we have notified you of a material change to our Policy in accordance with the Changes to This Privacy Policy Section below will be deemed an acceptance of these new terms.

2. What Information Do We Collect?

- a. **Personal Information.** When you use the WWYW Program, we may ask that you provide us with information that can be used to contact or identify you, commonly known as personally identifiable information. Personal Information we may collect includes your first and last name, phone number(s), email address, home or physical address, birthday, geographical location, image and payment card numbers.
- b. **Purchase Information.** If you choose to make purchases through the WWYW Program, WWYW may receive information about you and your purchases with WWYW, such as the date and time of your purchase, the transaction amount, the items purchased, and possibly other information used to make your purchase. We may also collect information you supply to us concerning your preferences and interests, as well as information we obtain through your use of the WWYW Program, such as your purchase history.
- c. **Other Information.** When you use the WWYW Program on your mobile phone, computer, or other device, our servers may record other information such as: (i) information your device sends or transmits, including your device type, your device ID number, and user settings (collectively, "Device Information"); (ii) information about your use of the WWYW Program, such as offers viewed and/or used and pages visited;

(iii) demographic information you provide, such as your gender, (iv) information about or from another content delivery platform; and (v) information derived from other sources such as offers viewed on our website or on our social media presence, or information provided by third parties. We may also receive information about you that is publicly available, such as when you submit information to a blog, chat room or social network. We encourage you to read the privacy policies for those third-party websites and services.

- d. Collection Tools. To collect, maintain, and use certain information, we may use session ID and persistent cookies, data collection tags or directives such as "pixel tags," Javascript scripts, API calls, and/or other storage on your device. A cookie is a small data file that is kept in your device's memory for record-keeping purposes. A pixel tag is an electronic image, often a single pixel and often transparent, that is placed on a web page and may be associated with cookies on your hard drive.

3. How Do We Use The Information. Subject to the restrictions described in this Privacy Policy and applicable law, we use information about you only for purposes related to WWYW's business, including to communicate with you, provide you with information about WWYW and its business partners, facilitate and improve your service experience and prepare and perform demographic studies. Additionally, if permitted by the applicable transaction provider, we may use this information to perform benchmarking, advertising, marketing, performance and promotional studies.

- a. Personal Information. First and foremost, we use Personal Information to communicate with you. When you sign up with WWYW for a giveaway, contact WWYW for information, purchase a product, like our classes or certification services, or apply to use our services, you will receive emails that confirm specific actions you have requested. You will receive notifications confirming your registration for giveaways, classes or services, the successful purchase of a class or service, and follow-ups from us if you wish to use our services. These emails are a necessary part of the giveaway and purchase processes. We may also send you responses to emails you send us, if appropriate.
 - i. We will send you email notifications from time to time. Typically we send these emails to notify you of a change in status for security purposes. For example, certain notifications are sent for your own protection to ensure that another person cannot make a change to your account without your knowledge, or to seek confirmation of an action you have taken. In other cases, these notifications involve changes to various legal agreements or website policies. Generally you may not opt out of such service-related emails.
 - ii. From time to time, we will send user surveys, feedback requests regarding user experience and website operations or marketing offers from us, or from us on behalf of our marketing partners. The completion of these surveys or requests for feedback or acceptance of any offer is strictly voluntary and you can opt out of receiving any such communications in the future by letting us know via the unsubscribe link included in any offer email you receive from us.

- iii. We may at times send emails, texts, or push notifications related to requests or giveaways. Standard text charges may apply.
- iv. In addition, we use Personal Information to: (i) administer, improve, and optimize the WWYW Program, (ii) personalize your experience with the WWYW Program, (iii) provide you with software updates and/or product announcements, (iv) facilitate user-generated purchase orders through the WWYW Program, (v) better understand your needs and interests, and (vi) provide you with further information and offers from us that we believe you may find useful or interesting, such as targeted advertising and promotional campaigns.

4. **Purchase Information and Other Information.** We may use Purchase Information and Other Information for a variety of purposes, including to administer, improve, and optimize the WWYW Program.
- a. We use Purchase Information to: (i) administer, improve and optimize the WWYW Program; (ii) match your Personal Information with transactions; (iii) analyze the usage and effectiveness of the WWYW Program; and (vi) to the extent permitted by applicable third parties, analyze trends and deliver tailored advertising.
 - b. We use Other Information to: (i) make your interactions with the WWYW Program easier and more personalized; (ii) save information relating to your activity for future interactions with the WWYW Program; (iii) better understand how you interact with the WWYW Program, and monitor aggregate usage by you and other users; (iv) monitor web traffic routing on the Services; (v) enable certain features of the Services; (vi) count users who visited certain websites and pages within websites and used applications or features; (vii) analyze the behavior of users of our websites and application; and (viii) determine the effectiveness of promotional or advertising campaigns and improve the overall WWYW Program.
 - c. Third-party Advertisers. If present, these advertisers on the WWYW Program may also place or read cookies on your browser. At any time, you may instruct your device to stop accepting cookies or to prompt you before accepting a cookie from websites you visit by changing your device's settings. Please note that if you do not accept cookies, you may lose some functionality of the WWYW Program.
 - d. Device Information. We may use Device Information together with both demographic or psychographic information we collect and have third-party analysis partners anonymously analyze usage patterns of users. We may also use Device Information to help us provide tailored marketing to you.
 - e. Administration. We may use information from third parties to administer, update or personalize the WWYW Program or invite you to the WWYW Program, at the request of your friend, and present relevant offers.
5. **When Do We Share Information?** WWYW does not disclose Personal Information to third parties except in limited circumstances including: (a) with your knowledge and consent; (b) as

described in this Privacy Policy; (c) as may be required by law, regulatory authorities, or legal process; (d) as permitted to protect the rights, property, safety, confidentiality, or reputation of WWYW or its users; (e) to enforce our terms and conditions; (f) to prevent fraud or cybercrime; or (g) to permit us to pursue available remedies or limit the damages that we may sustain. Before WWYW begins to transfer Personal Information to any third party acting as our agent, we will confirm that they have adopted, are subject to, or are contractually obligated to comply with the principles and objectives of this Privacy Policy.

- a. Personal Information. We may share Personal Information with:
 - i. Merchant Partners and Transaction Providers. If you choose to participate in the WWYW Program, we may share Personal Information and the payment card information you entered with appropriate transaction providers.
 - ii. Related Companies. We may share Personal Information with our affiliate, parent, or related companies so that they may use Personal Information for the purposes described in this Privacy Policy, and to provide the additional services of those group companies. WWYW remains responsible for the management of this information. Additionally, as our business continues to grow and change, we might restructure, buy, or sell subsidiaries and/or business units. In these transactions, customer information is often one of the transferred assets, remaining subject to promises made in the prevailing privacy policy. In the event WWYW, or substantially all of its assets or stock, is acquired, transferred, or disposed of (in whole or in part and including in connection with any bankruptcy or similar proceedings), Personal Information will as a matter of course be one of the transferred assets.
 - iii. Third-Party Service Providers. Under the protection of appropriate agreements, we may disclose Personal Information to third-party service providers we use to perform various tasks for us including data storage, consolidation, retrieval, analysis or other processing, as well as for the purposes of effective management of customer information and to help us communicate with you. These third parties are only given access to that information needed to perform their support functions and are prohibited from using it for other purposes. These third parties include affiliated and unaffiliated service providers in the United States.
- b. Purchase Information and Other Information. We may share Purchase Information or Other Information with our marketing partners or other third parties to allow them to assist us in delivering tailored advertisements, promotions and other incentives to specific audience segments of which you may be a part, when you use the WWYW Program. We may share aggregated Purchase Information or Other Information in a form that does not disclose your Personal Information, nor is reasonably likely to allow you to be personally identified, for the purposes of industry analysis, demographic profiling, investor reporting and similar purposes with third parties or the public. For example, we may disclose aggregated Purchase Information or Other Information in an industry white paper or press article. Or we may share this information with marketing partners or other third parties so that they can understand the interest level of our users in their products and services; so that they may provide you with an optimal

experience; and so that additional establishments can see the value of joining the WWYW network and may also become partners, further enriching the WWYW Program.

- 6. How Can You Change or Delete Your Personal Information?** You may review, update, correct or delete your Personal Information by contacting us. If you would like us to delete and/or remove your records from our system, please contact us and we will delete your information within 45 days, if we do not have any legal obligation to retain the record.
- 7. Mobile Marketing.** We take great precautions to keep the information you share with us safe and private. We will not disclose your Personal Mobile Phone Information to any persons or entities outside of our company, nor lease, license, rent, transfer, disclose, disseminate or otherwise grant access to such information. We take commercially reasonable security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of your Personal Information that you share, and we collect and store.
- 8. International Data.** If you are outside the United States, your information will be stored and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. Our Privacy Policy and its protection applies to your data. If you are located outside the United States and choose to provide information to us, WWYW collects Personal Information in the United States and processes it there. Your submission of such information represents your agreement to this collection, storage, and processing.
- 9. Links to Other Sites.** The WWYW Program may contain links or APIs (e.g. data or content exchange interfaces) to external services or websites of other companies or merchants. If you click on a button, banner ad or other type of third-party link, you will be directed to that third party's resources. The fact that we may link to or incorporate a merchant's services, functionality or website or present a banner ad or other type of advertisement, is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third-party services, functionality, websites or other resources, including their use of Personal Information, and you should exercise caution when deciding to disclose any Personal Information to a third party. We encourage you to read the privacy policies or statements of the other websites you visit to learn more about their privacy practices. These other parties may place their own cookies or other files on your computer or device, collect data or solicit Personal Information from you.
- 10. Children's Information.** The WWYW Program is not directed to children. We do not knowingly collect personally identifiable information from children under 18. If you are under 18 years of

age, please do not provide any information. If you are a parent or guardian that has become aware that your child has provided us with Personal Information without your consent, please contact us (info@wellnesswithinyourwalls.com). If we become aware that a member is under the age of 18 and has provided us with Personal Information without verifiable parental consent, we will delete such information from our files.

11. **How We Protect Your Personal Information.** All data are encrypted end to end, including passwords. We never send credit card information to our servers. Rather, we use PayPal, a widely trusted credit card processor to handle this data. You can review [PayPal's privacy policy](#). We employ administrative and electronic measures designed to safeguard and protect your information from unauthorized access and disclosure. In addition, we periodically review and enhance our security and privacy practices as needed. While we cannot guarantee that loss, misuse or alteration of data will not occur, we use commercially reasonable efforts to prevent such occurrences. It is also important for you to guard against unauthorized access to your passwords and the unauthorized use of your computer. We control access to your information via secure web pages and limit access to employees and third parties on a need-to-know basis. Federal and state regulations may require that we maintain and report aggregate demographic information on members who participate in transactions. We may also maintain information, including personally identifiable information of our members, for a period of seven (7) years or more.

12. **How Can You Help Protect Your Security?** You can take several precautions to protect the security of your computer and personal information: (i) log out of our website and close the internet browser when you finish a session; and (ii) install security software (antivirus and firewall) to protect your computer from external attacks. If you use a public computer that is accessed by other people, such as in a public library or Internet cafe, we recommend that you take special precautions to protect the security of your personal data. When accessing our website from a public computer we recommend you end your session by logging out completely, then closing the browser window, and clearing the browser's cache files.

13. **Changes to this Privacy Policy.** We are committed to complying with all applicable laws and regulations governing the collection and use of personal information. From time to time, WWYW will review its collection, use, and disclosure practices in order to assure that we are complying with our Privacy Policy and all applicable laws and regulations. If we make material changes to our Privacy Policy, we will issue an updated version of this Privacy Policy with an updated date legend and/or notify you via email, the Website or by other appropriate means prior to the change becoming effective if it is a significant change. You should review this Privacy Policy regularly to ensure you are familiar with any changes to it. If you do not consent to any changes to our Privacy Policy and as a result you would like us to not use or hold Personal Information about you in accordance with the revised terms, you may notify us

(info@wellnesswithinyourwalls.com) and/or you may discontinue your use of the WWYW Program.

14. **How To Contact Us.** If you have questions or concerns regarding this Privacy Policy, please contact WWYW at info@wellnesswithinyourwalls.com.

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