

WELLOVATE

PRIVACY AND INFORMATION SECURITY POLICY

The www.WAYAHEALTH.com and/or www.WELLOVATE.com Web Site and any online features, services and/or programs offered by WAYAHEALTH.COM and/or WELLOVATE.COM (collectively, "WELLOVATE" and/or the "Web Site") are committed to safeguarding your online privacy with respect to the personally identifiable information that we may obtain from you. Our Privacy and Information Security Policy ("Privacy Policy") answers frequently asked questions about your online privacy, including what personally identifiable information we may obtain from you and how it will be used and protected. WELLOVATE may from time to time change this Privacy Policy, so please check back periodically.

Please note, by accessing or using the Web Site, you consent to and agree to be bound by our [Terms of Use policy](#).

WHAT PERSONALLY IDENTIFIABLE INFORMATION DO WE OBTAIN FROM YOU? WHEN DO WE OBTAIN SUCH INFORMATION?

If, upon visiting our Web Site, your use is limited to browsing our informational content, we will not require that you provide us with any personally identifiable information. However, we may request personal information from you at other times. For example:

- If you enroll for an account membership through our Web Site, we may ask that you provide us with certain personal information, including your name, credit card number, expiration date, e-mail address, mailing address and telephone number.
- We collect the information you provide when you use our Services, including when you register for an account. This may include any information contained within our about any content that you provide.
- We may collect information obtained from wearable, mobile, or other devices where you install or access our Services. This information may assist us in our ability to provide you with Services, and may include, but is not limited to:
 - a. Device location information
 - b. Information about device hardware and operating systems, device settings, and device identifiers.
 - c. Information provided to us when you import or synch information contained on a wearable, mobile, or other device.
- We may collect information about how you use our Services, such as your content usage patterns.
- We may receive information about you from our third-party partners in an effort to improve our Services.
- If you post to our discussion forums, we will ask that you provide us with your name, e-mail address and password.
- If you choose to participate in a customer survey conducted by us or by one of our business partners, we may ask for your name, e-mail address and other information as may be required by the particular survey.
- If you report a problem or submit a customer review, we will ask that you provide your name, e-mail address, membership number, address, phone number and/or fax number. Should you contact us for any reason other than to report a problem and/or submit a review, we may also keep a record and/or copy of your correspondence with us.

HOW DO WE PROTECT THE SECURITY AND QUALITY OF YOUR PERSONAL INFORMATION?

To protect the security and quality of your personal information, we have implemented technical and managerial procedures to maintain accurate, current and complete information as well as to protect your personal information against loss, misuse or alteration when it is under our control. Your personally identifiable information will be encrypted while in transit and stored on our secured servers. We use Secure Socket Layer (SSL) encryption to facilitate confidential transfer of information. SSL helps prevent your information from being read by unauthorized persons as

this information is transmitted over the Internet. Your personal information is also password protected so that access is limited to yourself and those with whom you share your password, WELLOVATE, as well as third party access facilitated by WELLOVATE with your prior permission.

HOW DO WE USE YOUR INFORMATION?

Our primary use of your information is to administer, maintain and improve your experience on our Web Site generally as well as provide you with customized, personalization services and interactive communications.

- We use your information to provide you with Services aimed at improving wellness.
- We use your information to improve and develop our Services aimed at improving wellness.
- Although we may provide you with personalized tools or content to improve wellness, including personalized estimates of disease risks, WE DO NOT USE YOUR INFORMATION TO MAKE OR IMPLY ANY DECISIONS REGARDING THE DIAGNOSIS, MANAGEMENT, MITIGATION, PREVENTION, TREATMENT, OR CURE OF ANY DISEASE OR MEDICAL CONDITION.
- We may use the information available to us to help verify the appropriate use of our Services, and to help identify any violations in our [Terms of Use policy](#).
- We may from time to time send you e-mails regarding our Web Site and special promotions. Also, we occasionally may send you direct mail about products or services that we believe may be of interest to you.
- We use your IP address to help diagnose problems with our server and to administer the services offered on our Web Site. We also use your IP address to help identify you and to gather broad demographic information that we may share with our business partners, but only in the aggregate without any of your personally identifiable information.
- We may research the demographics, interests and behavior of our customers based on the information provided to us during membership registration, from our server log files, from cookies and from surveys. Our research may be compiled and analyzed on an aggregate basis. We may share this aggregate data with business partners, but only in the aggregate, without any of your personally identifiable information.

CAN YOU “OPT-OUT” OF RECEIVING COMMUNICATIONS FROM WELLOVATE?

If you change your mind and decide that you no longer want to receive promotional e-mails, you may opt-out at any time by simply clicking the “unsubscribe” link at the bottom of such e-mails.

PRIVACY POLICIES OF WELLOVATE PARTNERS

Third parties that have links on our Web Site may collect personally identifiable information about you. We are not responsible for the privacy policies or practices of such sites and the practices of these sites are not governed by this Privacy Policy. If you have questions about the privacy policies or practices of a third party site, you should contact the site administrator or web-master of the specific site. We may from time to time partner with other companies to offer co-branded services and/or promotions. Any information that you provide in connection with the co-branded services or any jointly sponsored promotions will become the joint property of WELLOVATE and its business partners. We will maintain your information in accordance with the terms of this Privacy Policy. However, this Privacy Policy does not govern the privacy policies and practices of our business partners. If you have questions about the privacy policies or practices of our business partners, you should contact them directly.

DO WE SELL OR RENT YOUR PERSONALLY IDENTIFIABLE INFORMATION?

No, as a general rule, we do not sell or rent your personally identifiable information to anyone. However, we may from time to time rent or sell demographic, and/or non-personally identifiable user information, and/or statistics in the aggregate that does not contain your personally identifiable information.

WITH WHOM DO WE SHARE INFORMATION?

We generally will not disclose any of your personally identifiable information except when we have your permission to do so or under some special circumstances described below.

- We may share non-personally identifiable user information to third parties for the purposes of delivering or improving our Services or for business purposes. Personally identifiable information is information that can by itself be used to identify who you are (such as your name or email address).
- We may share your personal information with our partners or clients strictly for the purposes of carrying out our Services. Otherwise, WE DO NOT SHARE PERSONALLY IDENTIFIABLE INFORMATION TO THIRD PARTIES UNLESS PROVIDED WITH YOUR CONSENT.
- As noted previously, we may from time to time partner with other companies to offer co-branded services and promotions. Any information that you provide in connection with the co-branded services or any promotions will become the joint property of WELLOVATE and its business partners.
- Under confidentiality agreements, we may match user information with third party data. We also may disclose aggregate demographic and/or user information and statistics in order to describe our customer base to prospective partners and other third parties, and for other lawful purposes.
- We may disclose your personally identifiable information without your prior permission in special cases. For example, we may have reason to believe that disclosing the information is necessary to identify, contact or bring legal action against someone who may be violating the User [Terms of Use policy](#), or may be causing intentional or unintentional injury or interference to the rights or property of WELLOVATE or any third party, including other customers. Also, we may disclose or access your personally identifiable information when we believe in good faith that law or regulation requires disclosure.

WHAT ARE COOKIES? HOW DO WE USE COOKIES?

Cookies enable us to customize and personalize your experience on our Web Site, including the products, services, and promotions that are offered to you. Essentially, a cookie is a small amount of data that is sent to your browser from a web server and is stored on your computer's hard drive. We use cookies for several purposes in connection with the operation of our Web Site

- We may use cookies to identify you and access your information stored on our computers in order to deliver you a better and more personalized experience. For example, we may use cookies to tell you about products and/or services specific to your interests.
- Upon request, we will save your "user name" so that you do not have to re-enter it every time you visit our Web Site. In providing you with this service, we use cookies.
- We may use cookies to estimate our customer base and customer usage patterns. Each browser accessing our Web Site may use given a unique cookie that is then used to determine the extent of repeat visits and the customer activity during those visits. We may use the historical information to help offer more personalized services based on customer interests and behavior, both specifically to individual customers and on an aggregate basis with respect to all customers.

Business partners that offer co-branded services and jointly-sponsored promotions on our Web Site, may use their own cookies. We have no control over those cookies, nor does this Privacy Policy cover how your personal information contained in those cookies may be used or protected. If you have any questions about the cookies of such third parties, or about the use of your personal information by such third parties, you should contact the site administrator or web-master of the third party site.

DO YOU HAVE CHOICES ABOUT COOKIES?

Yes, you have several choices with respect to cookies. You can modify your browser preferences to accept all cookies, to notify you when a cookie is set, or to reject all cookies. However, our Web Site uses cookie-based authentication. Accordingly, if you choose to reject all cookies, you may not be able to log onto our Web Site and/or use our services.

WHAT ELSE SHOULD YOU KNOW ABOUT YOUR ONLINE PRIVACY?

It is important to remember that whenever you voluntarily disclose personal information on-line, your information can be collected and used by others. If you transmit or post personal information on-line that is accessible to others, you will not be able to control how that information is used by others. When we receive the transmitted information, we

will use the procedures summarized in this Privacy Policy to ensure the integrity and security of that information in our systems. Unfortunately, notwithstanding any of the steps taken by us, it is not possible to guarantee the security and integrity of data transmitted over the Internet. Consequently, while we take the above-described reasonable steps to protect your personal information, we cannot and do not warrant the security or integrity of any information you transmit to us when registering for our Web Site or otherwise. All such transmission of information is at your own risk. Moreover, though we are committed to having our Web Site comply with this Privacy Policy, you are ultimately responsible for maintaining the secrecy of your password and your personally identifiable information. If you are careless with your password, or you decide to share your password with third parties, you must be aware of the risk that such third parties will have access to all your personally identifiable information.

CONTACT US.

If you have any questions or comments about this Privacy Statement or the practices of our Web Site, please feel free to e-mail us at contact@wellovate.com or visit our contact page.
