

# Wellify AB

## Privacy policy:

### Privacy Policy

This is the privacy policy (“**Privacy Policy**”) that governs how we, Wellify AB the owner of Wellify.nu and the Wellify app (“**Wellify**”, “**we**”, “**our**” or “**us**”), use Personal Information (defined below) that we collect, receive and store about individuals in connection with the use of: (i) the website [www.Wellify.nu](http://www.Wellify.nu), and app and any other website that we operate (each, together with its sub-domains, content and services, a “**site**” or “**app**”); and (ii) our health and wellness tool (the “**Service**”). The Service and/or the App may be available for use via a web browser or applications. We do not host ourselves any of the App and/or Service all hosting is done by third party service providers that we engage. This means that data you provide us or that we collect from you (including any Personal Information, as defined below) – as further described in this Privacy Policy – is hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers are located (and some are located in the US), their servers may be located anywhere in the world (including the US). Your data may even be replicated across multiple servers located in multiple countries. So please be aware that you are consenting to your data being transferred to various third party service providers around the world (including the US).

#### 1. Introduction.

We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online and app information practices and the choices you can make about the way your Personal Information is collected and used in connection with the App and/or the Service. “**Personal Information**” means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information.

#### 2. Terms of Service.

This Privacy Policy forms part of our Terms of Service which is available at [www.wellifyofficial.com](http://www.wellifyofficial.com) (“**Terms**”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

#### 3. Consent and Modification.

You are not legally obligated to provide us Personal Information, and you hereby confirm that providing us Personal Information is at your own free will. By using the App and/or Service, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the App and/or Service. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the App, and your continued use of the Services thereafter means that you accept those changes.

#### 4. What Personal Information We Collect and How We Collect It.

We do not currently require you to provide Personal Information in order to have access to general information available on the App. But, we do receive and/or collect Personal Information from you in the following ways:

4.1. User Account. In order to use certain services that we offer via the App such as use of the Service, you are required to create an account ("**User Account**"). If you create a User Account you will be required to provide us with certain information, such as your name, email address, as well as a password that you will use for your User Account ("**Account Information**"). You may also voluntarily choose to provide additional Personal Information as part of the User Account registration process and in connection with your ongoing use of your User Account such as profile photo, phone number, location, time-zone, job title, skills and other information you submit through the services. We may send you a text message to your mobile phone or an e-mail to the e-mail address you submit to confirm your registration. If you choose not to create a User Account, you may not be able to access or use certain features of the Service. 'Contact Us' Information. If you send us a "**Contact Us**" request, whether by submitting an online form that we make available or by sending an email to an email address that we display, you may be required to provide us with certain information such as your name and email address.

4.3. Profile. You can build a profile in connection with your User Account ("**Profile**"). Your Profile will include your name and other information that you choose to include in your Profile, such as your gender and a profile picture.

4.4. Usage Information. We may collect information about how you are accessing and using the App and /or Service, which may include administrative and support communications with us and information about the features, content, and links you interact with, and what third party integrations you use (if any). Such information may include Personal Information.

4.5. Information We Receive from Third Parties. We may receive and/or procure certain information, including Personal Information, from third parties, such as its service providers, ad networks and marketing agencies, which all relate to your preferences and your use of the App and/or Service.

4.6. Purchases. The App and/or Service may include the option to purchase certain products or services from us. If you choose to make a purchase we will require sufficient information from you to complete the transaction. Such information could include a credit card number and related account and billing information, invoice related information, and other data required to process the order. We may also update such data should you grant us permission to bill you or your credit card for recurring charges, such as monthly or other types of periodic payments. We use third-party service providers to process transactions, in which case you acknowledge and agree to review and be bound by the terms of service and privacy policy of said third-party service provider.

4.7. Log Files. We may make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, your device's type, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the App and/or Service, track users' movement around the App and/or Service, and gather demographic information.

4.8. Cookies and Other Tracking Technologies. Our App and/or Service may utilize “**cookies**”, anonymous identifiers and other tracking technologies in order to for us to provide our Services and present you with information that is customized for you. A “**cookie**” is a small text file that may be used, for example, to collect information about activity on the App and/or Service. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

4.9. Mobile Device Data. We may collect limited information from your mobile device in order to provide the Services. Such information may include your mobile device type, mobile device id, and date and time stamps of Services use. In addition, we may deploy tracking technologies within the Services to help us gather aggregate statistics, but we will not use Personal Information for such purposes.

4.10. Services Integrations. If, when using the App and/or Service, you integrate with a third party service, we will connect that third party service to ours. The third party provider of the integration may share certain information about your account with Wellify. However, we do not receive or store your passwords for any of these third party services.

4.11. Google Analytics. We may use a tool called “**Google Analytics**” to collect information about use of the App and/or Service. Google Analytics collects information such as how often users visit the App and/or Service, what pages they visit when they do so, and what other webapps they used prior to coming to the App and/or Service. We use the information we get from Google Analytics to maintain and improve the App and/or Service and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to the App and/or Service is restricted by the Google Analytics Terms of Service, available at <http://www.google.nu/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.nu/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.nu/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt- out Browser Add-on, available at <https://tools.google.nu/dlpage/gaoptout/>.

## 5. Customer Data.

In the course of using the Service, you may submit Customer Data. Our use of such Customer Data is in accordance with the Terms.

## 6. The Way We Use Personal Information.

If you submit or we collect Personal Information through the App and/or Service, then we may use such Personal Information in the following ways, via any applicable communication channel, including e-mail, SMS, etc.

6.1. We will use your Personal Information to provide and improve our Service, to send you marketing/advertisement communications that we believe may be of interest to you, to contact you in connection with the Service and certain programs or

offerings that you may have registered for, and to identify and authenticate your access to the parts of the App and/or Service that you are authorized to access.

6.2. We may use your designated email address to: (i) send you updates or news regarding the Service and our products; and/or (ii) respond to a “**Contact Us**” or administrative request (for example, to change your password).

6.3. We may send you service and administrative emails and messages. We may also contact you to inform you about changes in our App and/or Service, our Service offerings, and important Service related notices, such as security and fraud notices. These emails and messages are considered part of the Service and you may not opt-out of them. If you choose to send others an invitation email or message to use the Service we will use the contact information that you provide, or make available, to automatically send such invitation email or message. Your name and email address may be included in the invitation email or message.

6.4. We may transfer your Personal Information to our local or foreign subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries. We require that these parties agree to process such information in compliance with our Privacy Policy.

6.5. We may share your Personal Information with our third party service providers and partners, but only to assist us with our business operations and to provide our Service to you and other users. Such service providers may include, but not limited to, Amazon and Google. Such information may be transferred to other countries. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Information.

6.6. We may disclose your Personal Information or any information you submitted via the App and/or Service, with people/organization you specifically ask to share with.

6.7. We may share your contact details with our business partners and/or affiliates so they can contact you in order to offer or promote our Service.

6.8. We may disclose your Personal Information or any information you submitted via the App and/or Service if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of Wellify.nu, our users, yourself or the public.

6.9. As a User you acknowledge that there may be times when you contact us to help resolve an issue specific to a team of which you are a member. In order to help resolve the issue and given our relationship with our Customer, we may share your concern with the Customer.

## 7. Use of Anonymous Information.

We may use Anonymous Information (as defined below) or disclose it to third party service providers in order to improve our App and/or Service, to perform random tests for additional features and to enhance your experience with the App and/or Service. We may also disclose Anonymous Information (with or without compensation) to third parties, including advertisers and partners. “**Anonymous**

**Information**” means information which does not enable identification of an individual user, such as aggregated information about the use of our App and/or Service. This Privacy Policy is not intended to place any limits on what we do with data that is aggregated and/or de-identified so it is no longer associated with an identifiable user or customer of the Service.

### 8. Opting Out.

You may choose not to receive future promotional, advertising, or other Service-related emails from us by selecting an unsubscribe link at the bottom of each email that we send. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any **“Contact Us”** request as well as administrative emails (for example, in connection with a password reset request) that are necessary to facilitate your use of the App and/or Service.

### 9. Choice.

At all times, you may choose whether or not to provide or disclose Personal Information. If you choose not to provide mandatory Personal Information, you may still visit parts of the App and/or Service but you may be unable to access certain options, programs, offers, and services that involve our interaction with you.

### 10. Access/Accuracy.

To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any of your other Personal Information that we may be storing, you may submit an access request by sending an email to [info@Wellify.nu](mailto:info@Wellify.nu). Your email should include adequate details of your request.

### 11. Links to and Interaction with Third Party Products.

The App and/or Service may enable you to interact with or contain links to your Third Party account and other third party websites or apps, mobile software applications and services that are not owned or controlled by us (each a **“Third Party Service”**). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

### 12. Children’s Privacy.

The App and/or Service are not structured to attract children under the age of 13 years. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 13 years. If we learn that we have collected Personal Information from a child under 13 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at [info@Wellify.nu](mailto:info@Wellify.nu).

### 13. Security.

The security of Personal Information is important to us. We follow generally accepted industry standards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the App and/or Service, you can contact us at [info@Wellify.nu](mailto:info@Wellify.nu).

#### 14. Merger, Sale or Bankruptcy.

In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information and any other information you provided us in connection with the foregoing events.

#### 15. California Privacy Rights.

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [info@Wellify.nu](mailto:info@Wellify.nu). Please note that we are only required to respond to one request per customer each year.

#### 16. Our California Do Not Track Notice.

We do not track consumers over time and across third party websites or apps and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different web apps when a consumer uses the App and/or the Service.

#### 17. Deletion of Content from California Residents.

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information and you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

#### 18. numitment.

If you have any comments or questions regarding our Privacy Policy or if you feel your privacy was compromised, you can contact Wellify's privacy officer at [info@Wellify.nu](mailto:info@Wellify.nu) and request that she'll review your complaint.at

**Last updated: Feb 2, 2022**