

# Well Network Ltd Privacy Policy

Well Network Ltd (referenced further as “Company,” “we,” “us” and “our”) respects your individual privacy and values your confidence. We have adopted this Privacy Policy (“Privacy Policy”) to explain what information may be collected through our website, online platform, and mobile applications (collectively, the “Technology”), and how we may use this information, including our successors, parents, subsidiaries, affiliates, and related companies, and under what circumstances we may disclose the information to third parties..

## 1. Introduction

This Privacy Policy sets forth the general rules and policies governing your use of our Technology. Depending on your activities when using our Technology, you may be required to agree to additional terms and conditions.

We keep this Privacy Policy posted on our website, available at <https://joinwell.io/docs/joinwell-privacy-policy.pdf>, as well as our online platform and applications, and you should review it frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy.

**IMPORTANT – THIS IS A LEGAL AGREEMENT BETWEEN YOU AND THE COMPANY. WHEN YOU ACCESS OUR TECHNOLOGY, YOU CONSENT TO THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR TECHNOLOGY.**

## 2. Types of Information We May Collect

Our Technology has the ability to collect two types of information from and about you: (a) information that you provide that personally identifies you; and (b) information that does not personally identify you. We collect this information: (a) directly from you when you provide it to us; (b) automatically as you navigate through any of our Technology; and/or (c) from third parties, for example, our business partners.

**Personally Identifiable Information:** Our definition of personally identifiable information includes any information that may be used to specifically identify or contact you, such as your name, postal and email addresses, phone number, credit card information, etc.- In certain circumstances, we may request, allow or otherwise provide you an opportunity to submit your personally identifiable information in connection with a feature, program, promotion or some other aspect of our Technology. For instance, you may: (a) provide your name, address, and email address to register an account with us; (b) provide certain demographic information about yourself (e.g., age, gender, purchase preference, usage frequency, etc.) when participating in a survey or poll, or registering or creating a profile through any of our Technology; (c) provide payment information when ordering products or services via our Technology; or (d) post a general comment and/or

recommendation on our website or other Technology. Certain information may not be personally identifiable when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and name). Whether or not you provide this information is your choice; however, in many instances this type of information is required to participate in the particular activity or service, realize a benefit we may offer, or gain access to certain content through our Technology.

**Non-Personal Information:** Our definition of non-personal information is any information that does not personally identify you. Non-personal information can include certain personally identifiable information that has been de-identified; that is, information that has been rendered anonymous. We obtain non-personal information about you from information that you provide us, either separately or together with your personally identifiable information. We also automatically collect certain non-personal information from you when you access our Technology. This information can include, among other things: your IP address or other unique identifiers that are automatically assigned to your computer, mobile or other device used to access the Technology; the type of browser you are using (e.g., Internet Explorer, Firefox, Safari, etc.); the third party website from which your visit originated; the operating system you are using (e.g., Vista, Windows XP, Mac OS, etc.); the domain name of your Internet service provider (e.g., America Online, NetZero, etc.); the search terms you use on our Technology; the specific areas within our Technology that you visit; and the time of day and duration of your visits.

When you submit information to us through any of our Technology, you should be aware that your information is transmitted across the Internet and that no method of transmission over the Internet is 100% secure. Although we take reasonable security measures to protect your information when we receive it, you also need to ensure you take appropriate steps to protect your information.

### **3. Additional Information about Collection Methods**

A few of the methods and/or avenues that may be used to collect non-personal information include, without limitation, the following (and subsequent technology and methods hereafter developed):

**Cookies.** "Cookies" are small text files or other similar files placed and stored on the hard drive of a computer, mobile or other device when it is used to access the Technology. Cookies may be used for many purposes, including, but not limited to, remembering you and your preferences and tracking your visits to our website. Cookies typically work by assigning a number to the user that has no meaning outside of the assigning website. Cookies themselves do not typically contain any personally identifiable information. We may analyze the information derived from these cookies and other technological tools we employ (such as clear gifs/web beacons) and match this information with data provided by you or another party. We may provide our analysis and certain non-personal information to third parties (who may in turn use this information to provide advertisements tailored to your interests). If you do not want information to be collected through the use of cookies, your browser allows you to deny or accept the use of cookies. Cookies can be disabled or controlled by setting a preference within

your web browser or on your Device. If you choose to disable cookies on your computer, mobile or other device, some features of website or other Technology may not function properly or may not be able to customize the delivery of information to you. You should be aware that the Company cannot control the use of cookies (or the resulting information) by third-parties, and use of third party cookies is not covered by this Privacy Policy.

**Web Beacons.** “Web beacons” are small graphic images or other web programming code that may be included in our website pages. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users of our website pages. Unlike cookies, which are typically stored on your computer or mobile device’s hard drive, web beacons are embedded invisibly on web pages. Web beacons or similar technologies help us better manage content on our website and other Technology by informing us what content is effective, counting the number of users of the website and other Technology, monitoring how users navigate the website and other Technology, or counting how many e-mails, articles or links were actually opened or viewed.

**Embedded Scripts.** An “embedded script” is programming code that is designed to collect information about your interactions with the Technology, such as the links you click on. The code is temporarily downloaded onto your computer, mobile or other device from our server or a third party service provider.

**Web Traffic and Web Performance Analytics.** We may also collect information using a variety of reports from web traffic and web performance analytics companies to improve our Technology. This information allows us to better understand users of the Technology, and to customize the Technology while also tracking our success at reaching new audiences. This Privacy Policy does not govern the ability of any third party analytics company to use and share information collected by such company.

**IP Addresses.** An IP address is a number that is assigned to your computer, mobile or other computing device whenever you are surfing the Internet. Web servers (computers that “serve up” web pages) automatically identify your computer or other computing device by its IP address. When users request pages from our website, our servers may log their IP addresses. We may collect IP addresses for the following purposes, among others: system administration, to report non-personal aggregate information to others, and to track the use of our website. IP addresses are considered non-personal information and may also be shared as provided above.

**Email Communications.** If you send us an email with questions or comments, we may use your personally identifiable information to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public personal information, such as passwords, credit card information, social security numbers, or bank account information, to us by email. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us; that is, agree to some communications but not others. We reserve the right to send you transactional emails such as customer service communications.

**Other Disclosures.** Notwithstanding anything herein to the contrary, we reserve the right to disclose any personally identifiable or non-personal information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Technology, or other users; or (d) in an emergency to protect the health and safety of our users or the general public.

**Your California Privacy Rights.** California Civil Code Section 1798.83 permits Users that are residents of California to request from companies conducting business in California a list of all third parties to which the company has disclosed certain personally identifiable information as defined under California law for such third parties' direct marketing purposes. If you are a California resident and would like to make such a request, please email Company at [help@joinwell.io](mailto:help@joinwell.io) or write Company at the address noted below.

#### **4. Use of Collected Information**

The information collected through our Technology is generally used to fulfill your requests for our products and services, to respond to your inquiries about our offerings, to personalize your online experience, and in other ways naturally associated with the circumstances in which you provided the information. We may also use this information to later contact you for a variety of reasons, such as customer service, offering you other products or services that we believe may be of interest to you, or to communicate with you about content or other information you have posted or shared with us via our Technology. We may share or sell your personally identifiable information with affiliated companies and third parties including, but not limited to, our co-promotional partners, list rental/purchasing agencies, contractors, vendors, consultants and professional advisors to the extent necessary for them to perform services on our behalf, and persons or entities with whom we have marketing, business, or other relationships. In response to a legal process or law enforcement request we may disclose personally identifiable information. We also may disclose personally identifiable information if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law. Further, we may share your information, including your personally identifiable information, with our parent, subsidiaries and affiliates. We also reserve the right to disclose and transfer all such information to a subsequent owner, co-owner or operator of the Company's business, Technology or applicable database; or in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our membership interests and/or assets or other corporate change, including, during the course of any due diligence process.

We may use the non-personally identifiable information that we collect in a variety of ways, including to administer the Technology, help us analyze site traffic, understand customer needs and trends, carry out targeted promotional activities, improve the quality of the pages that make up our Technology, gather broad demographic information, and to improve our Technology services. We may use your non-personal information by itself or aggregate it with information we have obtained from others. We may share your non-personal information with our affiliated

companies and/or third parties to achieve these objectives and others. In addition to the foregoing, we may use your personally identifiable information or collected non-personal information as follows:

- When required by law or court order;
- To provide you with information or services or process transactions that you have requested or agreed to receive, including to send you electronic newsletters, or to provide you with special offers or promotional materials on behalf of us or third parties;
- To process your registration with the Technology, including verifying your information is active and valid;
- To improve the Technology, to customize your experience with the Technology, or to serve you specific content that is most relevant to you;
- To enable you to participate in a variety of the Technology's features such as online or mobile entry sweepstakes, contests or other promotions;
- To contact you with regard to your use of the Technology and, in our discretion, changes to the Technology and related policies;
- For inclusion in our data analytics; and
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy.

## **5. Deleting Information About You**

Whether or not you provide personally identifiable information is completely your own choice. You are not obligated to answer any question that is presented to you on our through our Technology. You may opt-out from receiving future promotional information from us or our affiliated companies, or direct that we not share your information with any affiliated companies, as set forth in Section 10 below. Whether or not you opt-out is your choice; however, in many instances this type of information is required to participate in a particular activity, realize a benefit we may offer, or gain access to certain content, services, or offers on our Technology.

## **6. User-Generated Content and Public Forums**

The Technology may offer publicly accessible blogs or community forums or other ways to permit you to submit ideas, photographs, user profiles, writings, recordings, computer graphics, pictures, data, questions, comments, suggestions or other content, including personally identifiable information (collectively, "**User Content**"). We or others may reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed). Others may have access to this User Content and may have the ability to share it with third parties across the Internet. You should be aware that any User Content you provide in these areas may be read, collected, and use by others who access them. Thus, please think carefully before deciding what information you share, including personally identifiable information, in connection with your User Content. Please note that Company does not control who will have access to the information that you choose to make public, and cannot

ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. This Privacy Policy does not apply to any information that you disclose publicly, share with others or otherwise upload. We are not responsible for the accuracy, use or misuse of any content or information that you disclose or receive. To request removal of your User Content from our blog or community forum or similar features, contact us as set forth in Section 10 below. In some cases, we may not be able to remove your User content, in which case we will let you know if we are unable to do so and why.

## **7. Protecting Children**

We take special care to protect the safety and privacy of children. Our site is a general audience site. Nevertheless, the features, programs, promotions, services and other aspects of our Technology requiring the submission of personally identifiable information are not intended for anyone under 18 years of age. No one under age 13 may provide any information to or on the Technology. We do not knowingly collect personally identifiable information from children under the age of 13. If you are under 13, do not use or provide any information on this Technology or on or through any of its features/register on the Technology, make any purchases through the Technology, use any of the interactive or public comment features of this Technology or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us please contact us at [help@joinwell.io](mailto:help@joinwell.io). If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

## **8. Keeping Your Information Secure**

We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your personally identifiable information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information. In the unfortunate event that your "personally identifiable information" (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) is compromised, we may notify you by e-mail (at our sole and absolute discretion) to the last e-mail address you have provided us in the most expedient time reasonable under the circumstances; provided, however, delays in notification may occur while we take necessary measures to determine the scope of the breach and restore reasonable integrity to the system as well as for the legitimate needs of law enforcement if notification would impede a criminal investigation. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

## **9. Collection of Information By Third-Party Sites, Ad Servers, and Sponsors**

Our Technology may contain links to other third party sites that we do not control or maintain. These sites may have information practices different from ours. You should exercise caution and

consult the privacy notices of all third party websites before accessing such websites, as we have no control over information that is submitted to, or collected by, these third parties. Company has no control over the privacy practices employed by any third party website or any third party products or services. Therefore, we cannot be responsible for the protection and privacy of any information that you provide while visiting such websites and such websites are not governed by this Privacy Policy.

## **10. Contact, Access, and Opt-Out Information**

You may contact us as at the following contact information if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any personally identifiable information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your personally identifiable information with others. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access or making corrections.

### **Contact Information:**

**info@joinwell.com**  
**(424) 221-5012**  
**Well Network Ltd**  
**800 Wilshire Blvd.**  
**Los Angeles, CA 90017**

We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Technology.

## **11. Sole Statement**

This Privacy Policy as posted on our website at <https://joinwell.io/docs/joinwell-privacy-policy.pdf> as well as our online platform and applications, is the sole statement of our privacy policy with respect to the Technology, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy.

## **12. Effective Date**

This Privacy Policy is effective as of January 1, 2018.