



# WANA Privacy Policy

Wana, Inc. (referred to herein as “we,” “us,” and “our”) is committed to protecting the privacy and security of the personal information we receive and collect from you. We also believe in transparency, and we are committed to informing you about how we treat your personal information.

This Website Privacy Policy (the “Policy”), together with our [Terms of Service](#), apply to [www.joinwana.com](http://www.joinwana.com) (the “Site”). This Policy describes the ways in which we use and share (1) personal information that users, visitors, and customers (“you” or “your”) provide to us when using the Site, and (2) certain information about you that is automatically collected when you access or use the Site. This Policy also describes certain rights and options that you may have with regard to your personal information.

This Policy does **not** apply to (1) information collected by us offline, or (2) information collected through any third party (including our affiliates and subsidiaries) and any third party application, website, or content (including advertising) that may link to or be accessible from or on the Site.

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE WEBSITE.

BY USING, ACCESSING, VISITING, OR REGISTERING WITH THE SITE, OR BY SUBMITTING YOUR INFORMATION THROUGH IT, YOU CONSENT TO THIS POLICY AND TO OUR COLLECTION AND SHARING OF YOUR INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS POLICY.

WANA MAY REVISE AND UPDATE THESE TERMS AT ANY TIME WITHOUT NOTICE TO YOU. YOUR CONTINUED USE OF THE “SITE” MEANS THAT YOU ACCEPT THOSE CHANGES. PLEASE CHECK THESE TERMS FREQUENTLY TO MAKE SURE YOU KEEP TRACK OF ANY CHANGES. IF YOU DO NOT AGREE TO A CHANGE, DO NOT USE THE SITE.



## What Information do We Collect?

We may collect and process the following personal information from you for the purposes set forth below:

Category	Types of Data and Purpose
<b>Contact Information</b>	When you visit the Site, we may ask you for your name, address, telephone number, email address, or other contact details in order to respond to your request or inquiry.
<b>User Account Information/Profile</b>	To access and use certain features of the Site, you must first complete a registration. When you create an account or register with us, we collect your contact information, other identity information (e.g., age, date of birth), other demographic information (location), diseases, treatments, username and password, and other information you provide for your profile. This information is necessary to enable us to provide you the account you have requested and to maintain the account and your profile. You may update your account information by editing the information associated with your account.
<b>Location Information</b>	When you use the Site, we may collect information about your use of the Site, including your interaction with advertising and analytics services on the Site, in order to (a) serve you the content and functionality you request, and (b) maintain the privacy and security of the Site and services. Location information collected may include your Internet Protocol (IP) address or unique device identifier.



<b>Cookies and Similar Technologies</b>	Please see the Cookies and Similar Technologies section of this Policy below. If you choose to disable cookies and similar technologies, some areas and features of the Site may not work properly.
<b>Automated Information</b>	When you visit our Site, we automatically collect information from your browser or your mobile device, which includes the date and time of your visit, your Internet Protocol (IP) address or unique device identifier, domain server, your browser type, cookies and data about which pages you visit in order to allow us to operate and provide the Site and our services. This information is used to understand how you interact with the Site and to provide you with advertising and a more personalized experience. To learn more about our collection of technical data, please see the Cookies and Similar Technologies section of this Policy below.
<b>Email Interconnectivity</b>	If you receive email communications from us, we may use certain tools to capture data related to if/when you open our message and if/when you click on any links or banners it contains. Other information collected through this email tracking feature includes: your email address, the date and time of your "click" on the email, a message number, the name of the list from which the message was sent, a tracking URL number, and a destination page. We use this information to enhance our marketing efforts.
<b>Feedback / Support / Inquiries</b>	If you provide us with feedback or contact us for support or to ask us questions, we will collect your name, address, telephone number, email



	address, and other information needed to respond to your feedback, or request for support, or to answer your question.
<b>Mailing List</b>	When you sign up for one of our mailing lists, we collect your contact information, including your email address.
<b>Your Communications</b>	When you communicate with us, we may retain your communications in order to process and respond to them, as well as to improve our services. We may use your email address to communicate with you about our services or send you periodic emails. If at any time you would like to unsubscribe from receiving future emails, you may unsubscribe at the bottom of each email.
<b>Third Party Information</b>	In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly-available sources.

## Cookies And Similar Technologies

A “cookie” is a small file created by a web server that can be stored on a user’s device for use either during a particular browsing session (a “session” cookie) or a future browsing session (a “persistent” cookie). This file may include information about your internet protocol (IP) addresses, browser type, internet service provider (ISP), URLs of any referring or exited webpages, operating system, and/or date and time stamps.

We may use cookies to enable certain website functions, develop web browsing analytics, store and track your preferences, and enable the delivery of advertising and marketing, when applicable. For example, we may track the number of “hits” or visits to the Site, the most popular times of day and



sections visited, and the range of devices and browsers most commonly used to view the Site. We may sell or distribute any of this information to third parties.

## First-Party Cookies

First-party cookies are set by the website you are visiting, and they can only be read by that site. Certain features of our Site may use session, persistent, and/or flash cookies.

“Session” cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session or after a set time period. “Permanent” cookies remain stored on a user’s hard drive until they expire or are deleted by a user. Local stored objects (or “flash” cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. Flash cookies are not managed by the same browser settings as browser cookies. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website at:

<https://www.macromedia.com/support/documentation/en/flashplayer/help/help09.html>.

## Third Party Cookies

You also may encounter third-party cookies on the Site. Third-Party Cookies are cookies that are stored on your web browser by a party other than us and may gather browsing activity (such as information you have entered or choices you have made) across numerous websites that you visit and across numerous browsing sessions. These cookies also help us to improve how the Site and services function and perform, to customize your interaction with the Site, and to provide more relevant messaging and marketing communications to you. We may currently be using third-party cookies to track and analyze usage. If you wish to delete third-party cookies, you should adjust your browser settings as described in the “CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION” section of this Policy.

We may use a Twitter Tweet widget (Twitter Button and Twitter Syndication) at the Site. As a result, our website makes requests to Twitter’s servers for you to be able to tweet our webpages using your Twitter account. These requests may make your IP address, browser type, operating system, hardware type, internet service provider, pages visited, location, your mobile carrier, and device



information (including device and application IDs) visible to Twitter, who may use it in accordance with their data privacy policy: <https://twitter.com/en/privacy#update>.

The Site also may use features provided by YouTube. As a result, when you visit a page with content embedded from or linked to YouTube, you are presented with cookies from YouTube. To view YouTube's privacy policy, visit <https://policies.google.com/privacy?hl=en>.

Our Site may also use DoubleClick, an ad serving service provided by Google. DoubleClick uses cookies to personalize ads. Your browser is assigned a pseudonymous ID used to track the ads that have been served to your browser and to identify those on which you've clicked. The cookies enable Google and its partners to select and display ads based on your browsing behavior. For more information on how Google uses this information, visit <https://support.google.com/admanager/answer/7670381>. To block certain ads served by Google, please visit <https://support.google.com/ads/answer/2662922>.

The Site may also use the ShareThis and/or AddThis social media cookies to allow you to share content from our Websites across your social networks such as Facebook, LinkedIn, Twitter and others. If you browse the internet while signed into a social network, that network may have the ability to collect information about the websites you are visiting, including ours. To view ShareThis' privacy policy, visit <https://www.sharethis.com/privacy/>. To view AddThis' privacy policy, visit <http://www.addthis.com/privacy/privacy-policy>.

We may also use Facebook Custom Audiences to deliver personalized advertisements to you on Facebook based on email addresses that we have collected. We also feature Facebook Connect, which gives you the option to post information about your activities to your profile page to share with others within your network by using a single sign-in service to authenticate your identity. You may learn more about Facebook Custom Audiences and Facebook Connect by visiting <https://www.facebook.com/policy.php>, where you can also find instructions for opting out of receiving advertisements.



We may also use LinkedIn Widgets on the Site to allow you to share content from our Site on your LinkedIn account. To opt out of targeted advertising from LinkedIn please visit <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>. LinkedIn's privacy policy is available at <sup>2</sup> <https://www.linkedin.com/legal/privacy-policy>.]

We may use other third-party cookies in addition to those expressly listed above. If you would like more detailed information about first party and third-party cookies in use on or related to the Site, please contact us.

### What similar technologies to cookies are in use and why do we use them?

Like most websites, as you navigate through and interact with the Site, we may passively collect information about your browsing activities using cookies and other automatic data collection technologies, such as Internet tags, web beacons (clear gifs., pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) in order to improve website functionality and analytics.

- **Web beacons:** These are tiny graphics (sometimes called "clear GIFs" or "web pixels") with unique identifiers that are used to understand browsing activity. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are rendered invisible on web pages when you open a page.
- **Social Widgets:** These are buttons or icons provided by third-party social media providers that allow you to interact with social media services when you view a web page or mobile app screen. These social widgets may collect browsing data, which may be received by the third party that provided the widget and are controlled by third parties.
- **UTM Codes:** These are strings that can appear in a URL (the "Uniform Resource Locator," which is typically the http or https address entered to go to a web page) when a user moves from one web page or website to another, where the string can represent information



about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

The aggregate data collected by these passive technologies typically does not target any personally identifying information, but personal information we store about you may be linked to information stored in and obtained from cookies in order to improve our marketing, analytics, or website functionality.

### Google Analytics and Similar Technologies

We may use Google Analytics and similar technologies to collect and process statistical data about the number of people using the Site and to better understand how they find and use our webpages. This does not include personally identifiable information, nor do we store or associate such analytics with personally identifiable information collected elsewhere. Any data collected is used in accordance with our Policy and its collection also may be subject Google's privacy policy, which we do not have control over. If you do not want to receive any user-based advertising, you can disable the placement of ads by using Google's ad settings detailed below.

You may learn more about Google Analytics and the performance and ad tracking cookies used by Google by visiting <https://www.google.com/policies/privacy/partners/> or <https://policies.google.com/technologies/ads?hl=en> as well as Google's restrictions on data use by visiting the Google Privacy Policy at: <https://www.google.com/policies/privacy>. To opt-out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> and install the opt-out browser add-on feature. For more details, visit the "Google Analytics opt-out browser add-on" page (located at <https://support.google.com/analytics/answer/181881?hl=en>). Google Analytics has certified compliance with the EU-US Privacy Shield Framework set forth by the U.S. Department of Commerce.

### Other Third-Party Technologies

Some third parties may use automated data collection technologies to collect information about you when you when you browse the Internet. The information they collect about your online browsing activities over time and across different websites and other online services may be





associated with your personal information and used to provide you with targeted content. We do not control these third parties' technologies or how they may be used. If you have any questions about targeted content, you should contact the responsible party directly or consult their privacy policies.

## Choices About Cookies

We provide you with choices regarding the personal information you provide to us, and we have created ways to give you control over our use of your information. Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website tracking technologies and advertising. Note that, if you decline the use of cookies, you may not have access to the full benefits of the Site.

## How We Use Your Information

We collect and use the types of personal information listed above in an effort to improve your experience on the Site, to provide services to you, and to communicate with you about the information you have requested. We may also use personal information to help target specific offers to you and to help us develop and improve the Site and our services. Additionally, we may use your personal information in the following ways:

- To provide you with the services you have requested and to manage our relationship with you, including administering your account, helping you find "buddies," suggesting content or other information we think you may find useful and taking other steps necessary to the performance of our business relationship with you;
- To present and improve the Site's content and functionality;
- To personalize your experience (your information helps us to better respond to your individual needs.)
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs.)



- To respond to visitor, subscriber, and customer inquiries;
- To determine user interests, needs, and preferences;
- To provide notice of changes to the Site or the services and products we offer or provide through it;
- To deliver services and products to you and honor our Terms of Use with you;
- To conduct research and analysis;
- To develop new products and services;
- To manage and maintain the security of the Site and our services;
- To administer a contest, promotion, survey or other site feature (we may periodically run a contest, sweepstakes, or survey relating to the Site. When we run a contest or sweepstakes relating to the Site, it will be accompanied by a set of rules. The rules for each contest/sweepstakes will specify how the information gathered from you for entry will be used and disclosed.)
- To market our services and products or third-party services and products to you.
- We may sell or distribute this information to third parties as well.
- To send periodic emails including information and updates. We will also use your contact information to respond to your requests or inquiries. We may use your contact information to send you information about our company, including our affiliates, the Site, our products or services, third party products or services or to contact you when necessary.

## Sharing and Disclosing of Your Personal Information

We may share your information in the following contexts:



Category	Disclosure Contexts
<b>Subsidiaries and Acquisitions</b>	<p>We may share your personal information with any corporate subsidiaries and affiliates, we have now or may have in the future, and with their respective officers, directors, employees, subcontractors, accountants, attorneys and agents. In addition, we may disclose your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about the Site’s users is among the assets transferred. For example, if another company acquires us, we will share your personal information with that company.</p>
<b>Disclosures With or Without Your Consent</b>	<p>We may share your personal information with other unaffiliated third parties who are not described elsewhere in this Policy and may do so without your additional consent, unless legally required to obtain separate consent. We may also disclose your personal information in response to subpoenas, warrants, court orders or other legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our legal rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property or a violation of our Terms of Service.</p>
<b>Public</b>	<p>Some areas of our Websites may offer forums or provide the opportunity for users to post comments or reviews in a public forum. Please remember that any information that is disclosed in these areas</p>



	<p>becomes public information, and you should exercise caution when deciding to disclose your personal information.</p> <p>If you decide to submit your personal information in these areas, you do so at your own risk and acknowledge that the information will be publicly-available. The information you submit, including personal information will be stored by us.</p>
<b>Third Parties</b>	<p>We may provide personal information about you to third parties that may offer products and services specifically requested by you.</p>
<b>Service Providers</b>	<p>We may share your personal information with our service providers that need access to your information to provide operational or other support services on our behalf. Among other things, service providers may help us to administer the Site, support our provision of services; provide technical support; send marketing, promotions and communications to you about our services; and assist with other legitimate purposes permitted by law.</p>
<b>Aggregated Data</b>	<p>We may disclose aggregated information about our users, and information that does not identify any specific individual, such as groupings of demographic data and customer preferences, for new product and marketing development.</p>

## How Long do We Store Your Personal Information?



We will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as long as necessary to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

When we, in our sole discretion, believe we no longer have a purpose to retain your personal information, we will securely destroy your personal information in accordance with applicable law and our policies. We take reasonable steps to delete the personal information we collect if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. To the extent permitted by law, we may retain and use anonymous and aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement.

## **How Do We Protect Your Information?**

We have put in place reasonable and appropriate security measures to protect the personal information that you share with us from being accidentally lost, used, altered, or disclosed or accessed in an unauthorized manner. From time to time, we review our security procedures to consider appropriate new technology and methods.

While our security measures seek to protect your personal information in our possession, no security system is perfect, and no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. We cannot promise that your personal information will remain absolutely secure in all circumstances. We are not responsible for circumvention of any privacy settings or security measures we may provide.

The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of the Site, you are responsible for keeping the password confidential. Do not share your password with anyone.



## International Transfers

We currently do not accept customers or users from outside the United States, and we will take reasonable steps to delete any data we receive from outside the United States. If you provide us data from outside the United States, it will necessarily be transferred to the United States for processing and storage.

## Rights And Choices About How We Use And Disclose Your Information

Please use the Contact Us details at the end of this Policy to exercise your rights and choices under this Policy. If you would like to manage, change, limit, or delete your personal information or if you no longer want to receive any email, postal mail, or telephone contact from us or our affiliates in the future, such requests may be submitted via the Contact Us details at the end of this Policy.

Email Opt-Out. If you no longer wish to receive communications from us via email, you may opt-out by contacting us at [privacy@joinwana.com](mailto:privacy@joinwana.com) and providing your full name, mailing address, phone number, and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take corrective action.

Cookies. As discussed above, you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly.

Updating Your Personal Information. If any of the personal information you have provided to us changes, please let us know. For instance, if your email address changes, you may wish to cancel any request you have made of us; or, if you become aware of inaccurate personal information about you, you may edit your account details if you have a user account through the Site. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Right of Access. If required by law, upon request, we will grant reasonable access to the personal information that we hold about you.



Right to Object. In certain circumstances, if permitted under applicable law, you have the right to object to processing of your personal information and to ask us to erase or restrict our use of your personal information. If you would like us to stop using your personal information, please contact us, and we will let you know if we are able to agree to your request.

Right to Erasure and Deletion of Your Personal Information. You may have a legal right to request that we delete your personal information when it is no longer necessary for the purposes for which it was collected, or when, among other things, your personal information has been unlawfully processed. All deletion requests should be sent to the address noted in the Contact Us section of this Policy. If you would like us to delete your personal information, please contact us, and we will let you know if we are able to agree to your request.

We may decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives. When we delete personal information, it will be removed from our active servers and databases and the Site; but, it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.

Right to Withdraw Consent. In most cases, we do not require your consent to process your personal data. However, if our processing of your personal data is based on your consent, you may have the right to fully or partially withdraw your consent. To withdraw your consent, please notify us using the information in the Contact Us section of this Policy. Once we have received notice that you have withdrawn your consent, in whole or in part, we will no longer process your information for the purpose(s) to which you originally consented and have since withdrawn unless there are compelling legitimate grounds for further processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal information for the provision of our services.



Online Tracking. We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions. “Do Not Track” is a web browser setting that seeks to disable the tracking of individual users’ browsing activities. We adhere to the standards set out in this Policy and do not currently respond to “Do Not Track” signals on the Site or on third-party websites or online services where we may collect information.

California Residents. Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing, if any, will be included in our response. As part of the California Online Privacy Protection Act, all users of our site may make any changes to their information at any time by contacting us at [legal@joinwana.com](mailto:legal@joinwana.com).

## Third Party Sites

This Policy is applicable only to the Site, and it does not apply to any third-party websites.

The Site may contain links to, and media and other content from, third-party websites. These links are to external websites and third parties with which we have no relationship. Because of the dynamic media capabilities of the Site, it may not be clear to you which links are to the Site and which are to external, third party websites. If you click on an embedded third-party link, you will be redirected away from the Site to the external third-party website. You can check the URL to confirm that you have left this Site.

We cannot and do not (i) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites, (ii) control third parties’ independent collection or use of your personal information, or (iii) endorse any third party information, products, services or websites that may be reached through embedded links on this Site.





Any personal information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms of use. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

## Children's Online Privacy Protection Act Compliance

We are committed to protecting the privacy of children. The Children's Online Privacy Protection Act ("COPPA"), as well as other data privacy regulations, restrict the collection, use, or disclosure of personal information from and about children on the Internet. Our Site and services are not directed to children under the age of 18, nor is information knowingly collected from children under the age of 18. No one under the age of 18 may access, browse, or use the Site or provide any information to or on the Site. If you are under 18, please do not use or provide any information on the Site (including, for example, your name, telephone number, email address, and username). If you believe we might have any information from or about a child under the age of 18, please contact us using the contact information provided below.

For more information about COPPA, please visit the Federal Trade Commission's website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

## Updates And Changes To This Policy

We reserve the right, at any time and without notice, to add to, change, update, or modify this Privacy Policy to reflect any changes to the way in which we treat your personal information or in response to changes in law. Should this Policy change, we will post all changes we make to this Policy on this page. Any such changes, updates or modifications shall be effective immediately upon posting on this page. The date on which this policy was last modified is identified at the beginning of this Policy.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, and from time to time, so you are aware of any changes. Your continued use of the Site after the "Last Modified" date will constitute your



acceptance of and agreement to such changes and to our collection and sharing of your personal information according to the terms of the then-current Policy. If you do not agree with this Policy and our practices, do not access, view, or use any part of the Site.

## Contact Us

For more information, or if you have any questions regarding this Privacy Policy, wish to exercise your rights, or wish to lodge a complaint with us, you may contact us using the information below, and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail.

**In Writing:** Wana Inc, 33 Irving Place, 3<sup>rd</sup> Floor, New York, NY 10003

**By Email:** [privacy@joinwana.com](mailto:privacy@joinwana.com)