

WayWiser.Life, Inc. PRIVACY POLICY

Last Updated: October 26, 2022

1. Introduction

WayWiser.Life (together with its subsidiaries, divisions, and brands, collectively, "WayWiser," "we," "us," or "our," as the context may require) is an online platform and mobile application connecting family, friends, and caregivers to help better manage the care and safety of an aging parent or loved one. This Privacy Policy (this "Policy") describes our privacy practices for the website(s) where this Policy appears (the "Site") as well as the mobile application and related media forms that are owned and managed by WayWiser (collectively, along with the Site, the "Services"), including the types of information we may collect from you when you visit the Services and our practices for collecting, using, protecting, and disclosing that information. We respect the privacy of the users of the Services ("you" or "your," as the context may require) and we are committed to respecting your privacy and the security of your personal information through compliance with this Policy.

Please read this Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. By accessing or using the Services, you agree to this Policy and our [Terms of Use](#) (collectively the "User Terms"). If you do not agree with our policies, practices, or terms and conditions contained in the User Terms, you may not visit, access, use, or otherwise interact with the Services.

This Policy and the User Terms may change from time to time (see [Section 11](#) [Changes to this Policy]). Your continued use of the Services after we revise this Policy or the User Terms means you accept such revisions and agree to abide and be bound by the most recent version of the Policy or User Terms, so please check this Policy and the User Terms periodically for updates.

2. The Interactions this Policy Covers

Except with respect to [Section 13.A](#) (California Privacy Notice) or as otherwise required by applicable law, this Policy describes and applies exclusively to personal information (as defined below) that we collect on or in connection with the Services and in texts, emails, and other electronic communications sent through or in connection with the Services. Except as otherwise provided in this Policy or as required by applicable law, this Policy does not apply to information that is collected by any application, website, or third party other than the Services, including through any application or content that may access, be linked to, or otherwise be accessible from the Services. If you visit an application, website, or third party that we mention or link to, be sure to review its privacy policy before providing it with any information.

Except as otherwise provided in this Policy, "personal information" is information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. "Personal information" does not include information which is generally not considered "personal information" under applicable law, such as information which is publicly available or subject to special data privacy laws and/or regulations-

3. Information We Collect

We collect several types of information from and about you as a result of your use of the Services and as a result of your communications with us. This information may include:

- Personal information, such as your name, username, and any other identifiers you might use, postal address, billing address, email address, telephone number, billing information (such as credit card information collected through Stripe, Inc. in accordance with the Stripe end-user privacy policy available at <https://stripe.com/privacy>), age, gender, household income, education, work history, product preference information, and any other information voluntarily provided to us by you.

- Personal information about your parent or other person for whom you are providing care (e.g., medication and prescription information, medical history and conditions, financial information, etc.). See WayWiser's [HIPAA Notice of Privacy Practices](#) for more details about coverage of Protected Health Information (PHI).
- Information that is about to or relates to you but is not personal information and which does not identify you, such as information which has been de-identified or aggregated in a manner where it can no longer be used to identify you.
- Information about your internet connection, the equipment you use to access the Services, IP address and other unique device identifiers, your activity on the Services, and other usage details.
- Any other information, including personal information, which you publicly disclose or share on the Services, or disclose to or share with us in any manner.

4. How We Collect Personal Information

We may collect personal information from and about you:

- Directly from you when you provide it to us;
- Automatically when you use or access the Services; and
- From third parties, to the extent permitted by applicable law.

A. From You

The personal information we collect directly from you when you use or access the Services includes:

- User profile information provided at the time of registering to use the Services and throughout your use of the Services, including contacts, calendars, lists, photos, and other details entered by you.
- Details of correspondence and transactions you carry out through the Services.
- Information that you provide by filling in forms on the Services. This includes information provided at the time of requesting further information. We may also ask you for information when you sign up for educational services like a webinar, enter a contest or promotion sponsored by us, and when you report a problem with the Services.
- Records and copies of your correspondence, including email addresses, if you contact us.
- Your responses to surveys that we might ask you to complete.
- Your search queries on the Services.
- Information you provide to us in a resume, application, email, or other communication in connection with an application for or other inquiry regarding employment with us.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Services or transmitted to other users of the Services or third parties (collectively, "[User Contributions](#)"). Your User Contributions are posted on and transmitted to others at your own risk.

B. Automatically

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Services.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- Stored files and information, such as photos, videos, and contacts, and other metadata.

The information we collect automatically is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Services.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. We use both session-based and persistent cookies. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them or until they expire. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Services, and overall functionality of the Services may be impaired. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.
- Web Beacons. Pages of our Services may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). We may also use web beacons or pixel tags to compile anonymized tracking reports regarding website user demographics and website traffic patterns. We may then provide these reports to advertisers and others. For our own research purposes, we may link such reports with personal information voluntarily provided to us. Once such a link is made, all of the linked information is treated as personal information and will be used and disclosed only in accordance with this Policy.
- Flash Cookies. Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Services. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Section 7 (Your Privacy Choices).
- Analytics. We may utilize third party companies and analytics to help us market, sell, and provide information about our products and services. We may use web analytics tools provided by service providers, including, but not limited to, Google Analytics, which is a third-party service that transmits website traffic data to Google services in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We may use reports provided by Google Analytics and similar service providers to help us understand traffic on the Services. For more information, concerning Google Analytics and how it collects and processes data, please see "How Google Uses Data When You Use Our Partners Web Sites or Apps," located at www.google.com/policies/privacy/partners. We may use the information provided by these tools to improve our services and our online advertisements. These tools place session and persistent cookies in your browser to identify you as a unique user the next time you visit, access, or use the Services. Each cookie cannot be used by anyone other than the service provider (e.g., Google Analytics).

Online Tracking Disclosures

We also may use these automatic data collection technologies to collect information about your online activities over time and across third-party websites or other online services (also known as behavioral tracking). The Services currently do not respond to "do not track" browser signals or any other mechanism which automatically communicates

your choice not to be tracked online. See Section 7 (Your Privacy Choices) for information on mechanisms that enable consumers to exercise choice about behavioral tracking and other privacy matters.

C. From Third Parties

We may also receive personal information or draw inferences about you from other sources, including service providers who collect or process information on our behalf. We generally require these service providers to use your personal information only as we direct and in a manner consistent with this Policy.

We may offer the opportunity to engage with our website and content we produce on or through third-party social networking websites, plug-ins, and applications. When you engage with our content on or through third-party social networking websites, plug-ins, and applications, you may allow us to have access to certain information associated with your social media account, which may include personal data (e.g., name, username, email address, profile picture, gender) to deliver the content or as part of the operation of the website, plug-in, or application. When you provide information from your social media account, we may, through third party advertisers or the social media host website or application, use this information to personalize your experience on the third-party social networking websites, plug-ins, and applications, and to provide you with other products or services you may request. We do not build profiles based on this information. The sharing of such information is exclusively controlled by the social media platform you are using. If you do not wish to share such information or exercise any data subject rights related to such information, please refer to the privacy notices or policies of the social media platform you are using.

5. How We Use Your Personal Information

We may use the personal information that we collect about you or that you provide to us:

- To provide you with the Site and Services, all relevant content, and any other information, products, or services that you request from us.
- To create, manage, maintain, and secure your account and to provide you with notices about your account.
- To process your requests, purchases, and payments.
- To notify you about changes to the Services or any products or services we offer though it.
- To identify your product and service preferences and customize our communications to you.
- To provide, support, personalize, and develop the Services.
- To prevent transactional fraud and monitor for other types of fraud, abuse, and illegal activity.
- To help maintain the safety, security, and integrity of the Services, as well as our products, services, databases, and other technology assets.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- For testing, research, analysis, and product development, including to understand our audience, develop and improve the Services, as well as our customer service, products, and services.
- To respond to law enforcement requests and, as required by applicable law, court order or governmental regulations.
- To evaluate, negotiate, or conduct a merger, divestiture, restructuring, reorganization, dissolution, other sale or transfer of some or all of our assets, or the negotiation thereof, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our users and customers is among the assets transferred.
- To contact you about employment if you submitted your resume or other application, email, or other communication in connection with an application for or other inquiry regarding employment with us.
- To fulfill any other purpose for which you provide it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use or disclose aggregated information about our users and information that does not identify any individual without restriction.

6. Disclosure of Your Personal Information

We may disclose personal information that we collect, or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them. For instance, we use Plaid, Inc. ("Plaid") to gather your financial data from financial institutions. By using the Service, you grant WayWiser and Plaid the right, power and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid end-user privacy policy available at <https://plaid.com/#end-user-privacy-policy>.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our users is among the assets transferred.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, and for billing and collection.
- To protect the rights, property, or safety of WayWiser, our customers, or others, in circumstances when we believe disclosure is necessary or appropriate.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may use or disclose aggregated information about our users and information that does not identify any individual without restriction.

7. Your Privacy Choices

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Promotional Offers from Us. If you do not wish to have your contact information used by the us to promote our own products or services, please contact us as provided in Section 12 (How to Contact Us). If you no longer wish to receive our e-mail newsletters or promotions, you may unsubscribe using the link provided in every e-mail or contact us as provided in Section 12 (How to Contact Us).
- Accessing and Updating Your Information. To update your information (name, mailing address, telephone number and email address), you can review and change your personal information by logging into the Services and visiting your account profile page. You may also contact us as provided in Section 12 (How to Contact Us) to update your information.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website, <https://thenai.org/opt-out>. Similarly, you can opt out of receiving targeted ads from members of the Digital Advertising Alliance ("DAA") on the DAA's website, <https://www.privacyrights.info>.

If you are a resident of certain jurisdictions (e.g., California), applicable law may provide you with additional rights regarding your personal information. Please see Section 13 (Jurisdiction-Specific Notices) for more information.

8. Security

We implement various physical, administrative, and technical safeguards in accordance with industry standards to protect the security of your personal information both online and offline. The safety and security of your information also depends on you. Where you have a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out personal information in public areas of the Services such as reviews or comments and in other areas of the Services that WayWiser does not directly control, such as in messages with other users of the Services. The information you share in public areas may be viewed by any user of the Services, and the information you share in messages may be viewed by anyone with access to the user profile you message.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

9. Accessing and Correcting Your Information.

You may contact us as provided below in Section 12 (How to Contact Us) to request access to, correct, or delete any personal information that you have provided to us. We may deny a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

10. Children's Privacy

The Services are not directed to nor intended for use by children under sixteen (16) years old ("Prohibited Users"). We do not knowingly collect personal information from Prohibited Users. Prohibited Users are not authorized to use the Services. If you are a Prohibited User, please do not provide any personal information to, on, or through the Services. If we learn we have collected or received personal information from a Prohibited User, we will delete that information. If you believe we might have any information from or about a Prohibited User, please contact us by any of the methods listed in Section 12 (How to Contact Us).

11. Changes to this Policy

We reserve the right to review and revise this Policy from time to time, without prior notice, subject to applicable legal requirements to notify you or obtain your consent. The date this Policy was last reviewed and/or revised is noted at the top of the page. You are responsible for periodically visiting the Site and this Policy to check for any changes. **Your continued use of the Services following the posting of changes constitutes your acceptance of such changes.**

12. How to Contact Us

To ask questions or comment about this privacy policy and our privacy practices, contact us:

Via mail: WayWiser.Life, Inc.
1920 E. Riverside Dr., Ste. A120-277
Austin, TX 78741
Via email: support@waywiser.life
Via phone: +1 (888) 897-1430

If you are a Data Subject and feel we have not resolved a privacy concern related to personal information processed or transferred by WayWiser, you have the right to submit a complaint to a supervisory authority.

13. Jurisdiction Specific Notices

A. California Privacy Notice

This [Section 13.A](#) (our "[California Privacy Notice](#)") applies exclusively to visitors of the Site and users of the Services who reside in the state of California ("[Consumers](#)"). We provide our California Privacy Notice to comply with California privacy laws, including the California Consumer Privacy Act of 2018 (the "[CCPA](#)"). Notwithstanding anything to the contrary elsewhere in this Policy, terms defined in the CCPA have the meaning assigned to them under the CCPA when used in this California Privacy Notice.

The CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("[B2B Personal Information](#)") and workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals ("[Workforce Personal Information](#)") from some its requirements.

I. Personal Information We Collect

We may collect, and in the last twelve (12) months have collected, the following categories of personal information from consumers:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. <i>Some personal information included in this category may overlap with other categories.</i>	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying	NO

Category	Examples	Collected
	information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data	Physical location or movements.	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

II. Sources of Personal Information

We may collect your personal information from the categories of sources of personal information identified in [Section 4](#) (How We Collect Personal Information).

III. Use of Personal Information

We may use, disclose, or otherwise process the personal information we collect for the purposes identified in [Section 5](#) (How We Use Your Information) and [Section 6](#) (Disclosure of Your Information).

IV. Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

We do not sell personal information.

Personal Information Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales
A: Identifiers	Service Providers (managed IT service provider); Operating Systems/Platforms (online databases,); Internet/Cloud Service Providers (Google Workspace, AWS)	None
B: California Customer Records personal information categories	Service Providers (managed IT service provider); Operating Systems/Platforms (online databases,); Internet/Cloud Service Providers (Google Workspace, AWS)	None
C: Protected classification characteristics under California or federal law	Service Providers (managed IT service provider); Operating Systems/Platforms (online databases,); Internet/Cloud Service	None

Personal Information Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales
	Providers (Google Workspace, AWS)	
D: Commercial information	None	None
E: Biometric information	None	None
F: Internet or other similar network activity	Data Analytic Platform (Google Analytics); Social Network (Facebook, Instagram, LinkedIn, Twitter)	None
G: Geolocation data	None	None
H: Sensory data	None	None
I: Professional or employment-related information	None	None
J: Non-public education information	None	None
K: Inferences drawn from other personal information	None	None

V. Your Rights and Choices

The CCPA provides consumers with specific rights regarding their personal information. This [Section 13.A.V](#) describes your CCPA rights and explains how to exercise those rights.

a. Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months (your "[Right to Know](#)"). Once we receive your request and confirm your identity (see [Section 13.A.V.c](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a "[Data Portability Request](#)").

To the extent permitted by applicable law, including for so long as permitted by the CCPA, we will not provide the foregoing disclosures for B2B Personal Information or Workforce Personal Information.

b. Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (your "[Right to Delete](#)"). Once we receive your request and confirm your identity (see [Section 13.A.V.c](#) (Exercising Your Rights to Know or Delete)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action. To the extent permitted by applicable law, including for so long as permitted by the CCPA, we will not provide the foregoing deletion rights for B2B Personal Information or Workforce Personal Information.

c. Exercising Your Rights to Know or Delete

To exercise your Right to Know or your Right to Delete described above, please submit a request by either:

- Calling us at +1 (888) 897-1430;
- Emailing us at support@waywiser.life; or
- Visiting <https://waywiser.life/california-consumer-request-form/>.

Only you or your authorized agent may make a verifiable consumer request related to your personal information. To designate an authorized agent, contact us through one of the methods listed above.

You may only make a Request to Know, Data Access Request, or Data Portability Request twice within a twelve (12) month period. Your Request to Know, Data Access Request, or Data Portability Request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or are an authorized representative of such person, which may include:
 - Information which we already maintain; or
 - If we cannot verify your identity based on information already maintained by us, such information that we or our representatives request from you.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

d. Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within this timeframe, please contact us as provided in [Section 12](#) (How to Contact Us).

We try to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period. We cannot respond to your request or provide you with personal information unless we can verify your identity or authority to make the request and confirm the personal information relates to you. If we cannot verify your request within forty-five (45) days of its receipt, we may deny your request.

Any disclosures we provide will only cover the twelve (12) month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising your sale opt-out or opt-in rights, see [Section 13.A.V.e](#) (Personal Information Sales Opt-Out and Opt-In Rights) below.

e. Personal Information Sales Opt-out and Opt-in Rights

WayWiser does not sell personal information of our Consumers. We will offer you the opportunity to opt out of certain communications, such as, for example, communications that deal with any of our products or services you are not using but that we think might be of interest to you. Where applicable, you can opt out by emailing us at support@waywiser.life. However, even if you opt out of such communications, you may continue to receive other transactional, relationship, and/or administrative communications from or through WayWiser that are important or related to your WayWiser account or the products and services you are using (such as, for example, a notice that there has been a change in one of your services or a change to this Privacy Policy). Please also note that you, not WayWiser, have control over certain settings for how communications such as emails and push notifications are displayed on your devices, and the settings you select will affect how WayWiser's communications are displayed. Recipients of marketing emails may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email or by contacting us at support@waywiser.life. Recipients will continue to receive service-related and other non-marketing emails, even after they opt out of marketing emails.

f. Non-Discrimination; Notice of Financial Incentives

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

From time-to-time, WayWiser may provide new and current users gift cards, discounts, and/or free premium features for participating in user interviews, surveys, and/or feedback programs (i.e., WayWiser beta program).

To participate in these financial incentives, a user must agree to provide feedback through various established channels (e.g., interviews, surveys, beta program) and Personal Information to include name, phone number, and email by replying to invitations sent via email or communicated through a phone call.

The dollar value the company attributes to the consumer data described in this financial incentive can range between \$5.00 to \$100.00.

WayWiser does not "sell," as the term is defined under the CCPA, Personal Information of users to any third parties.

Users can withdraw from a financial incentive at any time. To withdraw from a financial incentive, users may:

- Email their request to support@waywiser.life.
- Call in their request at +1 (888) 897-1430.
- Mail in their request to 1920 E. Riverside Drive, Suite A120-#277, Austin, TX 78741.

B. European Economic Area and United Kingdom Privacy Notice

This Section 13.B applies exclusively to visitors of the Site and users of the Services who are located in the European Union, the United Kingdom, the European Economic Area, or who are otherwise considered "data subjects" ("Data Subjects") under the EU General Data Protection Regulation ("GDPR"), the General Data Protection Regulation of the United Kingdom, their successor regulations, or any similar laws or regulations similar to or administered under the GDPR promulgated in any country in the European Union, United Kingdom or the European Economic Area (collectively "European Privacy Laws").

I. Rights of Data Subjects

If you are a Data Subject, you may have the following rights under European Privacy Laws:

- The right to request copies of your personal information. If you require more than one copy, we may charge you a reasonable fee.
- The right to request that we correct any personal information that you believe is inaccurate or complete any personal information which you believe is incomplete.
- The right to request that we erase your personal information, under certain circumstances.
- The right to request that we restrict the processing of your personal information, under certain circumstances.
- The right to object to our processing of your personal information, under certain circumstances.
- The right to request we transfer data that we have collected to you or directly to another organization, under certain circumstances.
- The right to withdraw your consent, explicit or otherwise, at any time. If we rely on your consent as the sole legal basis for our processing of your personal information, we cease such processing at the time you withdraw your consent.

For the purposes of European Privacy Laws, WayWiser is the data controller (i.e., responsible for controlling the processing of personal information covered by this Policy). If you are a Data Subject and would like to exercise any of the foregoing rights, please contact us as provided in Section 12 (How to Contact Us).

II. Transfer of Personal Information

The Services are operated and managed on servers located and operated within the United States. As such, we transfer, collect, store, and process your personal information in the United States. If you are located outside of the United States, please note that the United States may not have the same data protection laws as your jurisdiction. Whenever we transfer personal information, and whenever a third party we work with transfers personal information, we ensure an adequate transfer mechanism is in place when we are legally required to do so.

C. Nevada Privacy Notice

This Section 13.C applies exclusively to visitors of the Site and users of the Services who reside in the state of Nevada. Nevada provides its residents with a limited right to opt-out of certain personal information sales. Nevada residents who wish to exercise this sale opt-out right may email us at support@waywiser.life. Please include "Nevada" in your email subject line and include the following information in your email: (i) your name, (ii) Nevada resident address, and (iii) email address. However, please know we do not currently sell data triggering that statute's opt-out requirements.