

Wanelo Privacy Policy

Effective Date: July 25th, 2018

1. Purpose

We at Wanelo, Inc. ("**Wanelo**," or "**we**," "**us**," "**our**") know that you care about how your Personal Information is used and shared, and we take your privacy seriously. Please read the following to learn more about our privacy practices at Wanelo. By visiting or using Wanelo’s websites (each, a "**Site**"), mobile applications, forums, blogs, and other online or offline offerings (together with any and all future online and offline offerings operated by or on behalf of Wanelo, the “**Services**”), you acknowledge that you accept the practices and policies outlined in this Privacy Policy (“**Policy**”), and you consent to our collecting, using, and sharing your information in the following ways. This Privacy Policy is incorporated by reference into the Wanelo Terms of Service (the “**Terms**”) and any capitalized terms used herein without definition shall have the meaning given to them in our [Terms of Use](#).

2. Scope

This Privacy Policy applies to Personal Information that is Processed by Wanelo in the course of our business, including on Wanelo Services. All individuals whose responsibilities include the Processing of Personal Information on behalf of Wanelo are expected to protect that data by adherence to this Privacy Policy. This Privacy Policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions.

This Policy applies to all Wanelo’s operating divisions, subsidiaries, affiliates, and branches and any additional subsidiary, affiliate, or branch of Wanelo that we may subsequently form.

3. TRANSPARENCY/NOTICE—TYPES of Personal Information We Collect and How We Use It

The types of Personal Information we may collect (directly from you or from Third-Party sources) and our privacy practices depend on the nature of the relationship you have with Wanelo and the requirements of applicable law. Some of the ways that Wanelo may collect Personal Information include:

- You may provide Personal Information directly to Wanelo through interacting with the Services, participating in surveys, during events such as sweepstakes, and requesting Services, or information.
- As you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.

We endeavor to collect only that information which is relevant for the purposes of Processing. Below are the ways we collect Personal Information and how we use it.

3.1. Types of Personal Information We Collect

Wanelo collects Personal Information regarding its current, prospective, and former clients, customers, users, visitors, guests, and Employees (collectively "**Individuals**").

- Information You Provide to Us.** When you use the Services or engage in certain activities, such as registering for an account with Wanelo, purchasing or selling items, responding to surveys, requesting Services or information, or contacting us directly, we may ask you to provide some or all of the following types of information:
 - Creating an Account with Us.** Our Services may give you the ability to register for an account or to create and update a user profile on the applicable Service. If you create an account with us, we will collect Personal Information including, for example, email address, phone number and **user name**. We may indicate that some Personal Information is required for you to register for the account or to create the profile, while some is optional.
 - Selling or Purchasing Items Through Us.** If you sell or purchase items through Wanelo, we may collect Personal Information from you to facilitate your order, such as your name, shipping and billing address, items sold, purchased or returned, and payment information.
 - Communications with Us.** We may collect Personal Information from you such as email address, phone number or mailing address when you choose to request information about our Services, register for Wanelo’s newsletter or a loyalty program that we may offer from time to time, request to receive customer or technical support, or otherwise communicate with us.
 - Surveys.** From time to time, we may contact you to participate in online surveys. If you do decide to participate, you may be asked to provide certain information which may include Personal Information. All information collected from your participation in our surveys is provided by you voluntarily. We may use such information to improve our products, Sites and/or Services and in any manner consistent with the policies provided herein.
 - Posting on the Site.** Wanelo may offer publicly accessible comments, features, blogs, private messages, or community forums. You should be aware

that, when you disclose information about yourself on Wanelo’s comments, features, blogs, private messages, and community forums, the Site will collect the information you provide in such submissions, including any Personal Information. If you choose to submit content to any public area of the Site, such content will be considered "public" and will not be subject to the privacy protections set forth herein.

- **Registration for Sweepstakes or Contests.** Occasionally, Wanelo may run sweepstakes and contests. We ask those who enter in the sweepstakes or contests to provide contact information (e.g., an e-mail address). If you participate in a sweepstakes or contest, your contact information may be used to reach you about the sweepstakes or contest, and for other promotional, marketing and business purposes. Some jurisdictions require the Personal Information of contest winners to be posted publicly. All sweepstakes/contests entry forms will provide a way for participants to opt out of any communications that are not related to awarding prizes.
- **Information Collected from Merchants.** Wanelo "the App" provides an ecommerce plugin to merchants who use Shopify to power their stores. When you install or use the App in connection with your Shopify-supported store, we may access certain types of information from your Shopify account such as full name, address, store domain, date of birth, phone number, last four digits of your bank account, last four digits of your Social Security number, timezone, and email address. Additionally, we may collect the following types of Personal Information from you and/or your customers once you have installed the App: name; username; email address; age and/or birthday; gender; IP address; location; language; browser information; browsing history; device ID; carrier; device type; transactions; transaction-related data like zip code; billing address and shipping address; listings created; comments and reviews posted; photos posted; push notification credentials; credentials users provide us to communicate to them or link their Wanelo accounts with third-party services such as Facebook and Twitter; and any other information necessary for us to provide our Services.
- **Automatic Data Collection.** We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, IMEI, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.
- **Information Submitted Via Services.** You agree that Wanelo is free to use the content of any communications submitted by you via the Services, including any ideas, inventions, concepts, techniques, or know-how disclosed therein, for any purpose including developing, manufacturing, and/or marketing goods or Services. Wanelo will not release your name or otherwise publicize the fact that you submitted materials or other information to us unless: (a) you grant us permission to do so; (b) we first send notice to you that the materials or other information you submit to a particular part of a Service will be published or otherwise used with your name on it; or (c) we are required to do so by law.
- **Information from Other Sources.** We may receive information about you from other sources, including through Third-Party services and organizations to supplement information provided by you. For example, if you access our Services through a Third-Party application, such as an App Store or SNS, we may collect information about you from that Third-Party application that you have made public via your privacy settings. Information we collect through App Stores or SNS accounts may include your name, your SNS user identification number, your SNS user name, location, sex, birth date, email, profile picture, and your contacts on the SNS. This supplemental information allows us to verify information that you have provided to Wanelo and to enhance our ability to provide you with information about our business, products, and Services.
- Additionally, if you sign into the Services through a Third-Party service such as an SNS, your list of "friends" from that service may be automatically imported to Wanelo, and such "friends," will appear in your profile if they are also registered users of the Website.

3.2 How Wanelo Uses Your Information

We acquire, hold, use, and Process Personal Information about Individuals for a variety of business purposes, including:

- **To Provide Products, Services, or Information Requested.** Wanelo may use information about you to fulfill requests for products, Services, or information, including information about potential or future Services, including to:
 - Generally manage Individual information and accounts;
 - Respond to questions, comments, and other requests;
 - Provide access to certain areas, functionalities, and features of Wanelo’s Services;
 - Contact you to answer requests for customer support or technical support;
 - Allow you to register for events.
- **Administrative Purposes.** Wanelo may use Personal Information about you for its administrative purposes, including to:
 - Measure interest in Wanelo’s Services;
 - Develop new products and Services;
 - Ensure internal quality control;
 - Verify Individual identity;

- Communicate about Individual accounts and activities on Wanelo’s Services and systems, and, in Wanelo’s discretion, changes to any Wanelo policy;
 - Send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance;
 - Process payment for products or Services purchased;
 - Process applications and transactions;
 - Prevent potentially prohibited or illegal activities;
 - Enforce our Terms.
- **Marketing Wanelo Products and Services.** Wanelo may use Personal Information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. Wanelo may provide you with these materials by phone, postal mail, facsimile, or email, as permitted by applicable law. Such uses include:
 - To tailor content, advertisements, and offers;
 - To notify you about offers, products, and Services that may be of interest to you;
 - To provide Services to you and our sponsors;
 - For other purposes disclosed at the time that Individuals provide Personal Information; or
 - Otherwise with your consent.

You may contact us at any time to opt out of the use of your Personal Information for marketing purposes, as further described in Section 6 below.

- **Research and Development.** Wanelo may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services. From time to time, Wanelo may perform research (online and offline) via surveys. We may engage Third-Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us better serve Individuals by learning more about their needs and the quality of the products and services we provide. The survey responses may be utilized to determine the effectiveness of our Services, various types of communications, advertising campaigns, and/or promotional activities. If an Individual participates in a survey, the information given will be used along with that of other study participants. We may share anonymous Individual and aggregate data for research and analysis purposes.
- **Direct Mail, Email and Outbound Telemarketing.** Individuals who provide us with Personal Information, or whose Personal Information we obtain from Third Parties, may receive periodic emails, newsletters, mailings, or phone calls from us with information on Wanelo’s or our business partners’ products and services or upcoming special offers/events we believe may be of interest. We offer the option to decline these communications at no cost to the Individual by following the instructions in Section 6 below.
- **Services via Mobile Devices.** Wanelo may provide Services that are specifically designed to be compatible and used on mobile devices. Wanelo will collect certain information that your mobile device sends when you use such Services, like a device identifier, user settings, location information, mobile carrier, and the operating system of your device. Mobile versions of Wanelo’s Services may require that users log in with an account. In such cases, information about use of mobile versions of the Services may be associated with accounts. In addition, Wanelo may enable Individuals to download an application, widget, or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Information to Wanelo to enable Individuals to access accounts and to enable Wanelo to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. Wanelo may use personal or non-identifiable information transmitted to Wanelo to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices Wanelo provides.
- **Anonymous and Aggregated Information Use.** Wanelo may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Wanelo’s Services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Services. Anonymized or aggregated information is not Personal Information, and Wanelo may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Wanelo and with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.
- **Sharing Content with Friends or Colleagues.** Wanelo allows you to provide information about your friends through our referral and/or comment Services, such as "mention" where you may tag a friend to inform them of a product. Our Services may allow you to forward or share certain content with a friend or colleague. Personal Information that you may provide for a friend or colleague will be used to send your friend or colleague the content or link you request, but will not be collected or otherwise used by Wanelo or any other Third Parties for any other purpose.
- **Other Uses.** Wanelo may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

3.3 Cookies, Pixel Tags/Web Beacons, Analytics Information, and Interest-Based Advertising

We, as well as Third Parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies ("**Technologies**") to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a "**device**") that allow us to record certain pieces of information whenever you visit or interact with our Sites, Services, applications, messaging, and tools, and to recognize you across devices.

- **Cookies.** Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Site may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Site that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.
- **Social Media Buttons and Widgets:** Our Site includes social media features such as the Facebook, Instagram and Twitter buttons (that might include widgets such as the "share this" button or other interactive mini-programs). These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a Third Party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.
- **Analytics.** We may use analytics services, including Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. <http://tools.google.com/dlpage/gaoptout>.

Our uses of such Technologies fall into the following general categories:

- **Operationally Necessary.** We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our Sites, Services, applications, and tools. This includes technologies that allow you access to our Sites, Services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;
- **Performance Related.** We may use cookies, web beacons, or other similar technologies to assess the performance of our Sites, applications, Services, and tools, including as part of our analytic practices to help us understand how our visitors use our Sites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our Site content, applications, Services, or tools;
- **Functionality Related.** We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our Sites, Services, applications, or tools. This may include identifying you when you sign into our Sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our Sites;
- **Advertising or Targeting Related.** We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our Sites or on Third-Party Sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

If you would like to opt out of the Technologies we employ on our Sites, Services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits.

3.4. THIRD-PARTY WEBSITES, SOCIAL MEDIA PLATFORMS, AND SOFTWARE DEVELOPMENT KITS

The Site may contain links to other websites and other websites may reference or link to our Site or other Services. These other domains and websites are not controlled by us, and Wanelo does not endorse or make any representations about Third-Party websites or social media platforms. We encourage our users to read the privacy policies of each and every website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

- Additionally, you may choose to automatically transmit Third-Party account information to Wanelo or automatically transmit information in your user profile to a Third-Party account. We have no control over the policies and practices of Third-Party websites, so if you choose to allow these automatic transmissions, please review all Third-Party websites' policies, and especially their privacy policy, which may be different from ours.

Wanelo's Services may include publicly accessible blogs, community forums, or private messaging features. The Site and our other Services may also contain links and interactive features with various social media platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using our Site or other Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by Third Parties for any number of purposes.

We use Third-Party software development kits ("**SDKs**"), such as the adjust Inc. SDK, as part of the functionality of our Services. Third-Party SDKs may

allow Third Parties including advertisers to collect your personal information to provide content that is more relevant to you. You may opt out of tracking by following the instructions below.

3.5. Third-Party Payment Processing

When you make purchases through the Services, we process your payments through a Third-Party application, including the Apple Pay. The Third-Party application may collect certain financial information from you to process a payment on behalf of Wanelo, including your name, email address, address and other billing information.

4. Human Resources Data

Wanelo collects Personal Information from current, prospective, and former Employees, their contact points in case of a medical emergency, and beneficiaries under any insurance policy ("**Human Resources Data**"). The Human Resources Data we collect may include title, name, address, phone number, email address, date of birth, passport number, driver's license number, Social Security number or other government-issued identification number, financial information related to credit checks, bank details for payroll, information that may be recorded on a CV or application form, language abilities, contact information of third parties in case of an emergency and beneficiaries under any insurance policy. We may also collect Sensitive Human Resources Data such as details of health and disability, including mental health, medical leave, and maternity leave; information about national origin or immigration status; and optional demographic information such as race, which helps us achieve our diversity goals.

We acquire, hold, use and Process Human Resources Data for a variety of business purposes including:

- Workflow management, including assigning, managing and administering projects;
- Human Resources administration and communication;
- Payroll and the provision of benefits;
- Compensation, including bonuses and long-term incentive administration, stock plan administration, compensation analysis, including monitoring overtime and compliance with labor laws, and company recognition programs;
- Job grading activities;
- Performance and employee development management;
- Organizational development and succession planning;
- Benefits and personnel administration;
- Absence management;
- Helpdesk and IT support services;
- Regulatory compliance;
- Internal and/or external or governmental compliance investigations;
- Internal or external audits;
- Litigation evaluation, prosecution, and defense;
- Diversity and inclusion initiatives;
- Restructuring and relocation;
- Emergency contacts and services;
- Employee safety;
- Compliance with statutory requirements;
- Processing of Employee expenses and travel charges; and
- Acquisitions, divestitures, and integrations.

5. Onward Transfer—Wanelo May Disclose Your Information

5.1 Information We Share

We share your Personal Information only as described below (e.g., with our Third-Party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

- **We Use Vendors and Service Providers.** We employ service providers to perform tasks on our behalf and need to share your information with them so we can provide products or Services to you. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer

service activities; and (v) in connection with the provision of the Site. Wanelo has executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.

- **Business Partners.** Wanelo may share Personal Information with our business partners and affiliates for our and our affiliates’ internal business purposes or to provide you with a product or service that you have requested, such as to fulfill a transaction by an affiliate on Wanelo’s Services. You can recognize when an affiliated business is associated with a Wanelo transaction or Service by the store’s information published on store pages, product pages and details on order confirmation materials. Wanelo may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner’s name will appear, along with Wanelo. Wanelo requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Wanelo provided them.
- **Displaying to Other Users.** The content you post to the Site, including reviews and your user profile information may be displayed on the Site. Other users of the Site may be able to see some information about you, such as your name if you submit a review. User profile information, including without limitation your name, email address, and other information may be displayed to other users if you chose to enter such information on your user profile. Your user profile is public on the Services. Any content (including without limitation images, captions, and comments) you post on the Services is not protected by Wanelo; it becomes publicly available and can be collected and used by others and may be redistributed through the internet and other media channels. We are not responsible for other users who may view and use the posted information.
- **Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures).** We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect your, our or others’ rights, property, or safety; (iv) enforce Wanelo policies or contracts; (v) collect amounts owed to Wanelo; (vi) prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) disclose information for necessary or advisable reasons.

In addition, from time to time, server logs or other information may be reviewed for security purposes – e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, Wanelo will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

5.2. INTERNATIONAL Data Transfers

You agree that all Personal Information collected via or by Wanelo may be transferred, Processed, and stored anywhere in the world, including but not limited to, the United States, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to Wanelo, you explicitly consent to the storage of your Personal Information in these locations.

6. Opt-Out (RIGHT TO OBJECT TO PROCESSING)

6.1. General

You have the right to object to and opt out of certain uses and disclosures of your Personal Information. Where you have consented to Wanelo’s Processing of your Personal Information or Sensitive Personal Information, you may withdraw that consent at any time and opt out of further Processing by contacting privacy@wanelo.com.

6.2. Email and Telephone Communications

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding Wanelo and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).

6.3. Mobile devices

Wanelo may occasionally send you push notifications through our mobile applications with notices that may be of interest to you. You may at any time opt out from receiving these types of communications by changing the settings on your mobile device. Wanelo may also collect location-based information if you use our mobile applications. You may opt out of this collection by changing the settings on your mobile device.

6.4. Human Resources Data

With regard to Personal Information that Wanelo receives in connection with the employment relationship, Wanelo will use such Personal Information only for employment-related purposes as more fully described above. If Wanelo intends to use this Personal Information for any other purpose, Wanelo will notify the Individual and provide an opportunity to opt out of such uses.

6.5. "Do Not Track"

Do Not Track ("**DNT**") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

6.5. Cookies and Interest-Based Advertising

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings. See <http://www.networkadvertising.org/mobile-choice>.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at http://www.networkadvertising.org/managing/opt_out.asp, <http://youradchoices.ca/choices/>, <http://www.youronlinechoices.eu/> and www.aboutads.info/choices/. [here](#).

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted-out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device. Advertisements on Third-Party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners' use of this information for interest-based advertising purposes. Even if you opt out, we may still collect and use non-Personal Information regarding your activities on our Sites and/or information from the advertisements on Third-Party websites for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements. Note that if you opt out, the Services may not function properly, or some features may be unavailable.

7. Rights of Access, Rectification, Erasure, and Restriction

You may inquire as to whether Wanelo is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend or delete your Personal Information where it is inaccurate. Where otherwise permitted by applicable law, you may send an e-mail to privacy@wanelo.com or use any of the methods set out in this Privacy Policy to request access to, receive (port), seek rectification, or request erasure of Personal Information held about you by Wanelo. Please include your full name, email address associated with your account, and a detailed description of your data request. Such requests will be processed in line with local laws.

Although Wanelo makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which Wanelo is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy in the case in question or where it is commercially proprietary. If Wanelo determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Wanelo will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

8. Data Retention

Wanelo retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. Security of Your Information

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing.

10. International Users

By choosing to visit the Site, utilize the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in

this Privacy Policy will be governed by the laws of California, United States and the adjudication of any disputes arising in connection with Wanelo or the Site will be in accordance with the Terms.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information globally and to Processing of your data globally. By providing your Personal Information, you consent to any transfer and Processing in accordance with this Policy.

11. Children’s Privacy

The Services are not directed to children under 16 years of age in the EU and 13 years of age elsewhere, and Wanelo does not knowingly collect Personal Information from children under 16 in the EU or 13 elsewhere. If you learn that your child has provided us with Personal Information without your consent, you may alert us at privacy@wanelo.com. If we learn that we have collected any Personal Information from children under 16 years old in the EU or 13 elsewhere, we will promptly take steps to delete such information and terminate the child’s account.

12. Redress/Compliance and Accountability

If you have any questions about our privacy practices, this Privacy Policy, or how to lodge a complaint with the appropriate authority, please contact Wanelo by email at privacy@wanelo.com. We will address your concerns and attempt to resolve any privacy issues in a timely manner.

13. Other Rights and Important Information

13.1. Changes To Our Privacy Policy and Practices

This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the updated Privacy Policy is posted on the Services. If at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the Services.

- **Revision to the Privacy Policy.** We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit this Site and use the Services made available to you after such changes have been made, you hereby provide your consent to the changes.
- **Posting of Revised Privacy Policy.** If there are any material changes to this Privacy Policy, Wanelo will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.
- **New Uses of Personal Information.** Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is otherwise required by law or contract, Wanelo will endeavor to comply with the law or contract.

13.2. California Privacy Rights

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the Third Parties to whom we have disclosed their Personal Information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those parties. Except as otherwise provided in this Privacy Policy, Wanelo does not share Personal Information with Third Parties for their own marketing purposes.

14. Definitions

The following capitalized terms shall have the meanings herein as set forth below.

- **"Agent"** means any Third Party that Processes Personal Information pursuant to the instructions of, and solely for, Wanelo or to which Wanelo discloses Personal Information for use on its behalf.
- **"Employee"** refers to any current, temporary, permanent, prospective or former employee, director, contractor, worker, or retiree of Wanelo or its subsidiaries worldwide.
- **"Personal Information"** is any information relating to an identified or identifiable natural person (“**Individual**”).
- **"Process"** or “**Processing**” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **"Sensitive Data"** or “**Sensitive Personal Information**” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes Personal Information regarding EU residents that is classified as a “Special Category of Personal Data” under EU law, which consists of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where Processed to uniquely identify a person; (6) health information; (7) sexual orientation or information about the Individual’s sex life; or (8) information relating to the commission of a

criminal offense.

- "**Third Party**" is any company, natural or legal person, public authority, agency, or body other than the Individual, Wanelo or Wanelo’s Agents.

15. Revision history

Title (Effective Date)

Wanelo Privacy Policy Effective: [05/25/18]

Updated Wanelo Privacy Policy Effective: [07/25/18]

privacy@wanelo.com



ABOUT WANELO

- AboutHelp
- PressPrivacy
- iOSAndroid

BROWSE

- Top Stores
- Top People
- Wanelo IRL
- Store Directory
- Sitemap

SELL

- Sell Now
- Shopify App
- Downloads