WeThink

PRIVACY POLICY

WeThink recognizes that your privacy is very important, and we take it seriously.

This Privacy Policy applies to activities by WeThink and its affiliates and subsidiaries (collectively “WeThink,” “we” or “us”).

#### **OUR PRIVACY COMMITMENT**

We are committed to respecting your (“you,” “your”) privacy rights and concerns. As such, we have established and implemented this Privacy Policy (“Privacy Policy”) to inform you of how we use and protect the personal information we collect from you (“Personal Information”) when you visit or create an account on the WeThink website platform (“WeThink Platform”).

When you create an account on the WeThink platform, we collect your name, contact information, demographic information, and other information you provide, such as topics that you know about or find interesting. Your name, photo, and any other information that you choose to add to your public-facing profile will be available for viewing by the public and other users of the platform. Once you create a profile, others will be able to see in your profile certain information about your activity on the platform, such as the questions and answers you post, your followers and who you follow, topics of interest to you, the information you list as credentials, and your edits to your content.

You can connect your existing WeThink account with certain third-party networks. You can also elect to sign in or sign up to the WeThink platform through a Linked Network (eg: Twitter, LinkedIn, etc.) (“Linked Network”). If you elect to sign up or connect through a Linked Network, we receive certain profile and account information about you from the Linked Network. These Linked Networks may also appear in your profile so that people can find you on these Linked Networks. The specific information provided to us by the Linked Networks is determined by you and such Linked Networks and may vary by network. In all cases, the permissions page for the Linked Network will describe the information being shared. You should consult their respective privacy policies for information about their practices. You may elect to use information from the Linked Network to populate your profile on the WeThink platform or to import your contacts to help you find and connect with them on the WeThink platform or to invite them to join.

By visiting or using the WeThink Platform, you consent to our collection, use, storage, deletion, and disclosure of information relating to you as set forth in this Privacy Policy. This Privacy Policy is subject to change at any time for any reason and without notice. Any modifications will take effect when posted. Therefore, each time you access the WeThink Platform, you need to review the Privacy Policy upon which access to and use of the WeThink Platform is conditioned. By your continuing use of the WeThink Platform after changes are posted, you will be deemed to have accepted such changes. This Privacy Policy is only applicable to the WeThink Platform and not to any other website that you may be able to access from the WeThink Platform, which may have its own data collection and use policy.

In order to register an account, you will need to provide personal information in order to allow third-party identification verification software to verify your identity, including but not limited to (i) personal information including your particulars, images, and biometrics to establish your identity and background; and (ii) name, address, social security number, place of employment, etc.

**USES OF INFORMATION**

Any information shared with WeThink during the creation of a survey will potentially be public. By the nature of how our service works, surveys need to be shared via a URL on the Internet. Email addresses uploaded to the system for the purpose of sending survey invitations and email communication may be stored in our servers. We will never share any information uploaded to the system with any third parties. The results from surveys will be available to users of the WeThink Platform. There is the option to share online reports via a URL from the administrative account. The survey administrator controls this option. We will never use any of the data collected.

If you use a bulletin board or chat room or public forum on the WeThink Platform, you should be aware that any personally identifiable information you submit here can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these forums.

**TESTIMONIALS**

We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent, we may post your testimonial along with your name.

**IMPORT CONTACTS**

You can import contacts from your email account address book to invite them to take part in surveys. We collect the username and password for the email account you provide and will only use such information for the purpose of inviting contacts to take part in surveys.

**COOKIES**

The WeThink Platform uses cookies and similar technologies which are small files or pieces of text that download to a device when a visitor accesses a website or app. These analytics and performance cookies are used only when you acknowledge our cookie banner and are used to view site traffic, activity, and other data and/or to provide you with a personalized experience. Cookies may also be used to keep track of your login name and password, to track your visits to the WeThink Platform, to personalize your experience, and improve the WeThink Platform so the pages you view and other behavior may be stored by cookies on your device. These cookies contain no personally identifiable information. You may still access the WeThink Platform if you set your browser not to accept cookies.

**WEB ANALYSIS TOOLS**

We may use web analysis tools to measure and collect anonymous session information. We use this information to monitor and analyze in a depersonalized form how users use the WeThink Platform, to provide services to you, and to maintain and improve the WeThink Platform. We may also collect similar information from emails we may send to you which then help us track which emails are opened and which links are clicked. The information allows for more accurate reporting and improvement of the WeThink Platform.

The personal data collected when you visit the WeThink Platform include:

* Information about your browser, network, and device
* Web pages you visited prior to coming to this website
* Search engine used to locate the Sites and Services
* Web pages you view while on the Sites and Services and how long you use them
* Your IP address

**ACCESS BY MINORS**

The WeThink Platform is not designed to attract children under the age of 13 and we do not knowingly collect personally identifiable information from such children.

##### USE OF PERSONAL INFORMATION

We use your personal information to deliver products and services you request, handle your questions or issues, and send communications to you about promotions, updates, or special offers that may be of interest to you. Other uses include verifying your identity, preventing fraud, and alerting you of new products, features, or enhancements to the WeThink Platform. We may also use your email address to send you messages about the WeThink Platform, as well as other general announcements.

The personal information uploaded by you, except for your social security number and driver’s license number, may be shared with third parties for certain purposes. We may also use your depersonalized personal information to provide analyses of our users in the aggregate (including Analytical Data subject to the terms of this Privacy Policy) to prospective partners and other third parties.

By submitting personal information through the WeThink Platform, you authorize us to share this personal information for the purposes identified herein, and you grant us a royalty-free, worldwide, perpetual, irrevocable, and fully transferable right and license to use your personal information in connection with the uses outlined in this Privacy Policy, including to produce analytical data (“Analytical Data”) about our users. We are expressly authorized to make any commercial use of the Analytical Data, including without limitation sharing the Analytical Data with third parties.

We will also share the personal information we collect from you under the following circumstances:

Feedback. You may choose to, or we may invite you to, submit comments, bug reports, ideas, or other feedback (“Feedback”). By submitting Feedback, you agree that we are free to use such Feedback at our discretion without any obligation to you. We may also choose to disclose Feedback to third parties. You hereby grant us a royalty-free, perpetual, irrevocable, transferable, sublicensable, worldwide, nonexclusive license under all rights necessary to incorporate and use your Feedback for any purpose.

Asset Transfers. If we become involved in a merger, acquisition, or other transaction involving the sale of some or all of our assets, your information may be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you through email and/or a prominent notice on the WeThink Platform.

**DATA RETENTION**

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

**SOCIAL MEDIA WIDGETS**

The WeThink Platform includes social media Features, such as the Facebook “Like” button, and Widgets, such as the “Share This” button or interactive mini-programs that run on our site. 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. Social media features and widgets are either hosted by a third party or hosted directly on the WeThink Platform. Your interactions with these features are governed by the privacy policy of the company providing it.

**PAYMENT**

If you make a purchase through the WeThink Platform, we may use a third-party payment processor such as Stripe or Paypal. Payments are encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express, and Discover.

Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.

**THIRD PARTY SERVICES’ PRIVACY POLICIES**

In general, the third-party providers used by us will only collect, use, and disclose your information to the extent necessary to allow them to perform the services they provide to us or to provide products and services to you. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner your personal information will be handled by these providers.

Certain providers may be located in a different jurisdiction or have facilities that are located in a different jurisdiction, than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website’s Terms of Service.

**LEGAL DISCLOSURE OF YOUR INFORMATION**

We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service.

**ELECTRONIC COMMUNICATION; SIGNATURES**

You may withdraw your consent to receive communications by following the “unsubscribe” link at the bottom of our emails. You may withdraw your consent to use an electronic signature at any time by contacting us. If you withdraw your consent, you will be unable to apply for products and services through the WeThink Platform, and we will be unable to continue to process any pending applications for products and services.

##### HOW IS YOUR PERSONAL INFORMATION SAFEGUARDED?

##### While we strive to protect sensitive user information, we cannot ensure or warrant the security of any information you transmit to us or through the use of the WeThink Platform, and you acknowledge and agree that you provide such information and engage in such transmissions at your own risk.

In the event that personal information you provide to us is compromised as a result of a breach of security, when appropriate we will take reasonable steps to investigate the situation, notify you, and take the necessary steps to comply with any applicable laws and regulations.

#### **MEDIATION**

#### You agree that, in the event any dispute or claim arises out of or relating to this Privacy Policy, you and we will attempt in good faith to negotiate a written resolution of the matter directly between the parties. You agree that if the matter remains unresolved for forty-five (45) days after notification (via certified mail or personal delivery) that a dispute exists, all parties shall join in mediation services in our state of domicile with a mutually agreed mediator in an attempt to resolve the dispute. Should you file any arbitration claims or any administrative or legal actions without first having attempted to resolve the matter by mediation, then you agree that you will not be entitled to recover attorneys’ fees, even if you would otherwise be entitled to them.

**RESIDENTS OF CALIFORNIA**

You must opt out of allowing your personal information to be shared.

### Your California Consumer Privacy Act of 2018 (CCPA) Rights

### Categories of Personal Information We Collect

The California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”) requires specific disclosures for each category of personal information that we collect. The table below summarizes our general data handling practices which are more fully described in Sections B, C and D of this Privacy Notice.

|  |  |  |  |
| --- | --- | --- | --- |
| Category of Personal Information | Categories of Sources From Which Personal Information Was Collected(See Section B of this Privacy Notice for additional information) | Business or Commercial Purpose for Collecting and Sharing the Category of Personal Information(See Sections C and D of this Privacy Notice for additional information) | Categories of Third Parties and Other Entities We Share Personal Information With(See Section D of this Privacy Notice for additional information) |
| Identifiers *(§1798.140 (o)(1)(A) and (B))* which include elements such as: (i) contact information (e.g., name, mailing address, email address, phone number); and (ii) online identifiers (e.g., Internet protocol (IP) address, account numbers, device identifiers such as mobile advertising IDs) | Directly from you  From your friends or contacts (for example, if they forward you one of our articles)  From cookies and similar technologies  From third-party sites or apps, content distribution channels, and platforms  From third-party data suppliers and business partners  From social media platforms and similar services | To provide you with and to improve the Digital Services  To communicate with you  For advertising and marketing purposes for us or third parties, including interest-based advertising  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With content measurement companies  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |
| Demographics (§1798.140 (o)(1)(C)) which include elements such as age and gender | Directly from you  From cookies and similar technologies  From third-party sites or apps, content distribution channels and platforms  From third-party data suppliers and business partners  From social media platforms and similar services | To provide you with and to improve the Digital Services  For advertising and marketing purposes for us or third parties, including interest-based advertising | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With content measurement companies  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |
| Personal Information under subdivision (e) of Section 1798.80 of the California Civil Code (§1798.140 (o)(1)(B)) which includes payment information (e.g., payment card number, expiration date and billing information) | Directly from you | To provide you with and to improve the Digital Services  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With government authorities as required by law or as necessary to protect our rights |
| Commercial Information (§1798.140 (o)(1)(D)) which includes elements such as transactional information  (e.g., activity, subscriptions, requests, purchases, items in your cart but not completed purchases) | Directly from you  From cookies and similar technologies | To provide you with and to improve the Digital Services  To communicate with you  For advertising and marketing purposes for us or third parties, including interest-based advertising  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |
| Internet or other electronic network activity (§1798.140 (o)(1)(F)) which includes elements such as information about how you use, access, or interact with the Digital Services such as comments, photos, videos, and other content you choose to publish on the Digital Services, information about your device, browser, or operating system | From cookies and similar technologies  From third-party sites and apps, content distribution channels and platforms  From third-party data suppliers and business partners  From social media platforms and similar services | To provide you with and to improve the Digital Services  To communicate with you  For advertising and marketing purposes for us or third parties, including interest-based advertising  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With content measurement companies  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |
| Geolocation Data (§1798.140 (o)(1)(G)) which includes elements such as location information (e.g., city and state, or precise location information if location services are active on your device) | Directly from you  From cookies and similar technologies | To provide you with and to improve the Digital Services  To communicate with you  For advertising and marketing purposes for us or third parties, including interest-based advertising  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With content measurement companies  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |
| Audio, Electronic, Visual, Thermal, Olfactory or Similar Information (§1798.140 (o)(1)(H)) which includes elements such as recordings of your calls | Directly from you | To provide you with and to improve the Digital Services  To communicate with you  To protect our or others’ rights | With affiliates and subsidiaries  With service providers |
| Professional or Employment-Related Information (§1798.140 (o)(1)(I)) which includes elements such as your professional email address, phone number or other contact information if you have used such professional or employment related personal information to order a subscription, register for an account or to receive communications | Directly from you  From third-party data suppliers and business partners  From social media platforms and similar services | To provide you with and to improve the Services  To communicate with you  For advertising and marketing purposes for us or third parties, including interest-based advertising  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With content measurement companies  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |
| Inferences (§1798.140 (o)(1)(K)) which include elements such as inferences regarding your preferences or other characteristics (e.g., cooking enthusiast, travel, food, and dining) | Directly from you  From cookies and similar technologies  From third-party sites and apps, content distribution channels and platforms  From third-party data suppliers and business partners  From social media platforms and similar services | To provide you with and to improve the Services  To communicate with you  For advertising and marketing purposes for us or third parties, including interest-based advertising  To protect our or others’ rights | With affiliates and subsidiaries  With service providers  With advertising and marketing service providers and partners  With content measurement companies  With social media platforms  With business partners  With government authorities as required by law or as necessary to protect our rights |

Residents of California may have the following rights:

1. **Right to know and access your personal information.**Under CCPA, you have the right to:

* Know the categories of personal information we collect and the categories of sources from which we got the information;
* Know the business or commercial purposes for which we collect and share personal information;
* Know the categories of third parties and other entities with whom we share personal information; and
* Access the specific pieces of personal information we have collected about you.

To do so, please send a request to us and include your name, email address, phone number, California postal address, as well as your account information.

2. **Right to deletion.**In some circumstances, you may ask us to delete your personal information. To do so, send us a request and include your name, email address, phone number, California postal address as well as your subscription account number, if you have an active subscription.

3. **Right to opt out of sales.** We may share your personal information with third parties in ways that may constitute a “sale” under CCPA. You may request that we not “sell” your personal information on a going forward basis. To do so, either click the link “Do Not Sell My Personal Information, or send us a request and include your name, email address, phone number, California postal address as well as your member account number. **If you reengage with us after opting out of the "sale" of your personal information, such as by creating a new profile, you acknowledge that your personal information may be used and shared in accordance with this Privacy Notice, including in ways that may constitute a "sale" under CCPA.**

4. **Right to be free from discrimination.** You may exercise any of the above rights without fear of being discriminated against. We are permitted to provide a different price or rate to you if the difference is directly related to the value provided to you by your data. We use the information you provide to make your CCPA rights requests to verify your identity, locate the personal information we may hold about you and act upon your request. We strongly recommend that you submit the email and postal address that you used when you created accounts, ordered subscriptions, or signed up for a newsletter. After you submit a CCPA rights request, you will be required to verify access to the email address you submitted. You will receive an email with a follow-up link to complete your email verification process. You are required to verify your email in order for us to proceed with your CCPA rights request. Please check your spam or junk folder in case you can't see the verification email in your inbox. If you are a California resident and have any questions regarding your CCPA rights under this Privacy Notice, please contact us.

### Authorized Agents

For any of the CCPA rights, you may designate an authorized agent to make a request on your behalf. In the request, you or your authorized agent must provide information sufficient for us to verify the identity of your agent and that your agent has been properly authorized to act on your behalf; this may take additional time to fulfill your request. If you are an authorized agent working on behalf of a consumer, you will need to fill out the relevant CCPA request form listed above on behalf of the consumer with the consumer’s information. Please note that the consumer you are working on behalf of must have a California postal address and will need to verify access to the email account used to submit the CCPA request in order for us to move forward with processing the request.

### Minors

We do not knowingly collect or disclose personal information of minors under the age of 16, without affirmative authorization.

**ADDITIONAL TERMS AND PRIVACY POLICY FOR EU CITIZENS**

Under the General Data Protection Regulation (GDPR) of the European Union (EU), EU citizens are entitled to certain privacy protections regarding the use of, storing, and processing of your personal information as well as having right to be notified if personal information is stolen, copied, or accessed on an unauthorized basis.

The GDPR is a modern privacy rights framework adopted to create better transparency and control over who, how and when your personal data may be used, including the “right to be forgotten”.

This section will explain how We complies with the GDPR and how your personal data may be collected, stored, and used.  We also explain under what circumstances and for what purposes we may use your personal data and also provide instructions on how you can “opt-out” from our using your personal data and also request the removal of your personal data from our systems.

**OUR BUSINESS**

We provide services to United States consumers and potentially United States businesses and share personally identifiable information with third parties. If you share your information with us, we may share it with third parties, including sharing your information for other marketing purposes. Additionally, if you are an employee of or associated with a business customer, certain information may be considered personal data such as your business email, business mobile number, or other similar information from which your personal identity may be known.  It is also customary in many instances for business associates to furnish their private or personal contact information such as private email address, home telephone number, and similar information.  Even if done in the context of a business purpose, this information may be deemed personal data.  Therefore, if you believe your business information discloses personal data that you do not wish disclosed, you should not give it to us.  You should also ask your employer to change your business contact information to an anonymized format, such as changing your email form “my.name@mycompany” to “randomcharacters@mycompany”.

Please be advised that our business has less than 250 employees.  Accordingly, we are subject to less stringent recording requirements under GDPR requirements. We are, however, not exempt from other privacy protection and reporting requirements which apply to all businesses equally.

**QUESTIONS**

If you have any questions about our privacy practices or this Privacy Policy, please contact us.