

Privacy Policy

Last updated: January 09, 2022

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. This Privacy Policy has been created with the help of the Privacy Policy Template. This Policy may be amended or updated from time to time, so please check it regularly for updates.

This Privacy Policy applies to all information collected about you when you interact with the app, regardless of how it is collected or stored, and describes, among other things, the types of information collected about you when you interact with the Services, how your information may be used, when your information may be disclosed, how you can control the use and disclosure of your information, and how your information is protected.

Except as otherwise noted in this Privacy Policy, Healthy Belly is a data controller (as that term is used under the [EU General Data Protection Regulation](#) (“GDPR”), which means that we decide how and why the information you provide to us is processed. Please contact us. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of your information, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Application** means the software program provided by the Company downloaded by You on any electronic device, named Healthy Belly
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Healthy Belly.
- **Country** refers to: Israel
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Application.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include usage Data, demographic data (e.g., your age);

records of your consents; information about your interactions with our content or any views or opinions you provide to us, but is not limited to.

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

“Personal Information” means information that is about any individual, or from which any individual is directly or indirectly identifiable.

“Process”, “Processing” or “Processed” means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We may Process the following categories of Personal Information about you:

- Personal details: areas or topics of interest; information provided in response to your foods of interest, including foods of interest for pregnancy safety, symptoms you log, eating habits, pregnancy information such as due date or other related information, food liking and disliking.
- Demographic information: gender; age/date of birth; nationality; salutation; and language preferences.
- Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- Views and opinions: any views and opinions that you or other users choose to send to us, or publicly post about us on social media platforms or in the Services, including on forums.

We also collect other kinds of information from you or other sources, which we refer to as “Other Information” in this Policy, which may include but is not limited to:

- Information about your use of the Services, such as usage data and statistical information, which may be aggregated.
- Non-precise information about the approximate physical location (for example, at the city or zip code level) of a user’s computer or device derived from the IP address of such computer or device (“GeoIP Data”).
- Device identification (“ID”), which is a distinctive number associated with a smartphone or similar handheld device, but is different than a hardware serial number.
- Advertising ID, which is a unique, user-resettable identification number for advertising associated with a device (e.g., iOS uses the Identifier for Advertising (or “IDFA”) and Android uses Google Advertising ID).
- Internet Protocol (“IP”) address, which is a unique string of numbers automatically assigned to your device whenever you access the Internet.
- Information collected through the use of cookies, eTags, Javascript, pixel tags, device ID tracking, anonymous identifiers and other technologies, including information collected using such methods and technologies about (i) your visits to, and interaction and engagement with, the Services, content and ads on third party websites, applications, platforms and other media channels (“Channels”), and (ii) your interaction with emails including the content and ads therein (collectively, “Online Data”).
- Device type, settings and software used.
- Log files, which may include IP addresses, browser type, ISP referring/exit pages, operating system, date/time stamps and/or clickstream data, including any clicks on customised links.

- Web Beacons, which are electronic files that allow a website to count users who have visited that page or to access certain cookies.
- Pixel Tags, also known as clear GIFs, beacons, spotlight tags or web bugs, which are a method for passing information from the user's computer to a third party website.
- Local Shared Objects, such as Flash cookies, and Local Storage, such as HTML5.
- Mobile analytics to understand the functionality of our mobile applications and software on your phone.

Under certain circumstances and depending on applicable law, some of this Other Information may constitute Personal Information. Personal Information together with Other Information is hereinafter referred to as "User Information".

We may also use User Information you have provided to us with data obtained from third parties to enhance our records or enhance our ability to provide products and services, such as appending additional information to your profile.

Purposes for Which We May Process Your Information

Summary – Purposes for Which We May Process Your Information

We may Process User Information for the following purposes: providing the Services to you; communicating with you; providing advertising to you on the Services and Channels; analysing engagement with our audience; observing user engagement and purchase activity across the Service and Channels; offering lead generation services; marketing our services and offerings to current and prospective customers; managing our IT systems; financial management; conducting surveys and quizzes; ensuring the security of our systems; conducting investigations where necessary; compliance with applicable law; and improving our Services.

The purposes for which we may Process User Information, subject to applicable law, include:

- Provision of the Services to You: providing the Services to you from Healthy Belly or its partners including (i) offering of contests, (ii) management of your account, and (iii) customer support and relationship management.
- Offering and Improving the Services: operating and managing the Services for you; providing personalised content to you; communicating and interacting with

you via the Services; identifying issues with the Services and planning improvements to or creating new Services; and notifying you of changes to any of our Services.

- Identification: using information from third parties to verify information about you in order to provide the Services (e.g. verify your mailing address to send you requested products or services).
- Surveys and Quizzes: engaging with you for the purposes of obtaining your views on our Services, as well as learning more about your interests, including your interest in third parties and their offerings.
- Research: analysing, benchmarking and conducting research based on User Information and your interactions with the Services.
- Communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) regarding content and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required. We may provide direct marketing to you as set out in Section 6 below.
- Advertising: providing advertising based on your interests and interactions with the Services and Channels, including using User Information to serve you advertisements on the Services and Channels, as well as licensing segments of User Information to third parties.
- Audience Engagement: identification and development of audience engagement, advertising and promotional strategies on various platforms and channels, both within the Service and on Channels.
- User Engagement and Purchases: tracking purchase traffic and activity across the Service and on Channels; provision of analytics and measurement of cost of traffic against money being made.
- Lead Generation: producing customer leads that are shared with third party advertisers through marketing campaigns, including but not limited to email marketing and site placements.
- Marketing to Customers: We may market to current and prospective customers and their employees who have indicated an interest in doing business with, or have previously conducted business with, Healthy Belly in order to further generate and promote our business. Such efforts include sending marketing emails or conducting phone calls to drive the purchase of advertising, marketing our lead generation, job boards, and other business services offered by Healthy Belly.
- IT Administration: administration of Healthy Belly's information technology systems; network and device administration; network and device security;

implementing data security and information systems policies; compliance audits in relation to internal policies; identification and mitigation of fraudulent activity; and compliance with legal requirements.

- Security: electronic security measures (including monitoring of login records and access details) to help mitigate the risk of and provide the ability to identify and rectify a security incident.
- Financial Management: general business and financial management purposes, including: economic, financial and administrative management; planning and reporting; personnel development; sales; accounting; finance; corporate audit; and compliance with legal requirements
- Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.
- Legal Proceedings: establishing, exercising and defending legal rights.
- Legal Compliance: Subject to applicable law, we reserve the right to release information concerning any user of Services when we have grounds to believe that the user is in violation of our Terms of Use or other published guidelines or has engaged in (or we have grounds to believe is engaging in) any illegal activity, and to release information in response to court and governmental orders, other requests from government entities, civil subpoenas, discovery requests and otherwise as required by law or regulatory obligations. We also may release information about users when we believe in good faith that such release is in the interest of protecting the rights, property, safety or security of Healthy Belly, any of our users or the public, or to respond to an emergency.

Data Minimization

Summary – Data Minimization

We take every reasonable step to limit the volume of your User Information that we Process to what is necessary.

We take every reasonable step to ensure that your User Information that we Process is limited to the User Information reasonably necessary in connection with the purposes set out in this Policy or as required to provide you services or access to the Services.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For business transfers:** We may use Your information to evaluate or conduct 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 Data held by Us about our Service users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our

promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to

retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

EU Residents. GDPR provides certain rights for EU residents. You may decline to share certain information with us, in which case we may not be able to provide some of the features and functionality of the Services. These rights include, in accordance with applicable law, the right to object to or request the restriction of processing of your information, and to request access to, rectification, erasure and portability of your own information. Where we process your information on the basis of your consent, you have the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Information in reliance upon any other available legal bases). Requests should be submitted by contacting us. If you are an EU resident and have any unresolved privacy concern, you have the right to contact the appropriate EU Supervisory Authority and lodge a complaint.

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation

- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: healthybellyapp@gmail.com