

Privacy Policy

This Privacy Policy was last updated on 22 September 2022

Jasan travel marketing Pvt Ltd is a company incorporated in india whose registered office is c/o Bhabat Road Zirakpur Punjab (hereafter referred to as "jasan wellness", "we" or "us" as the context may require).

This Privacy Policy applies to your use of the JW token mobile application (the "web3wellness App") which hosts the Jasan wellness Marketplace ("Marketplace") and uses the JWtoken reward point ("JWs"), any website operated by company (including <http://jasanwellness.fit>) (the "Jasan wellness Website(s)") and the services we provide that are accessible via any of them (the "Services"). This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be stored and processed by us.

MINIMUM AGE REQUIREMENT

Please note that you must be aged 13 years or older to use the Services. Please do not use the Services or provide us with any personal information if you are under 13 years of age.

INFORMATION WE MAY COLLECT FROM YOU

From time to time, we may collect or ask you to provide personal information including (without limitation) the following: your name, mobile phone number, email address, password, identification credentials, your contacts, biographical details, photographs and/or payment information.

We also automatically collect, store and use information about your use of the Services, and about your computer, tablet, mobile or other device through which you access the Services. This includes the following information:

- Technical Data: including the Internet protocol (IP) address, browser type, internet service provider, device identifiers, your login information, time zone setting, browser plug-in types and versions, preferred language, activities, operating system and platform, and geographical location; and
- Usage Data: including the full Uniform Resource Locators (URL), clickstream to, through and from the jasan wellness Websites, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), date and time pages are accessed, website navigation and search terms used, and whether you have opened our marketing newsletters.

We may also automatically record the purchases you have made through the web3wellness App or Jasan wellness Websites using JW token ("Transaction Data") to obtain an understanding of your preferences so that we can provide you with more tailored marketing where appropriate.

As part of the Services, we may provide functionality allowing you to search for friends by using your Facebook credentials and, when you elect to do this, you will be asked to allow the web3wellness App to access certain information associated with your Facebook account such as your name, profile picture, gender and list of friends. Provided you consent to this, such information will be processed by us in order to identify your Facebook friends who are users of web3wellness App and to allow you to invite those Facebook friends to install the web3wellness App.

Please note that, with your consent, we will collect information about your location and physical movements in order for the web3wellness App to function properly and monitor and verify forms of eligible movement. You may turn location monitoring on and off from time to time using the settings of your operating system of your mobile device but, if you disable this functionality, we will not be able to collect information relating to your step-count and GPS/Cell-ID location which will prevent tracking and/or conversion of your movement into JW tokens.

We work with third parties from time to time (including, for example, Apple Health Kit, Near Foundation, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers who may provide to us information about you. This may include your purchase history from business partners who supply you with rewards made available via the web3wellness App.

USES MADE OF YOUR PERSONAL DATA

As a data controller, we will only use your personal data if we have a legal basis for doing so. The table at Annex 1 sets out the purposes for which we use your personal data as well as the relevant legal bases on which we do so.

WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal data with the following recipients as necessary to achieve the purposes set out in Annex 1 or as otherwise described below:

- Other users. Certain information of your personal data may be shared with other users of the web3wellness App as part of the normal operation of the Services (for example your uploaded profile picture and biographical information will be accessible to all users, and we may publish your total verified steps, or other movement, during a particular period to other users from time to time).
- Service providers. We may share your personal data with third party service providers that perform services for us or on our behalf, which may include providing data hosting, customer relationship management, payment processing and analytics services.
- Business partners. We may share your personal data with our trusted business partners in order that they can contact you from time to time with offers that may interest you and/or inform you of other products or services, provided you have given your consent for us to do so.

- Law enforcement, regulators, governmental authorities and other parties for legal reasons. We may share your personal data with third parties if we are legally required to do so, or if we believe, in good faith, that such disclosure is necessary to comply with a legal obligation or request, to enforce our terms and conditions, to prevent or resolve security or technical issues, or to protect the rights, property or our safety, or the safety of our users, a third party, or the public.
- Purchasers and third parties in connection with a business transaction. If we are involved in a merger, acquisition, bankruptcy, reorganisation, partnership, asset sale or other transaction, we may disclose your personal data as part of that transaction.
- Other members of the Jasan wellness group. We share personal data about you with other members of the Jasan wellness group, including The Jasan Travel Marketing Pvt Ltd.

In addition, we may share your personal data with other third parties if you have provided your consent for us to do so.

INTERNATIONAL TRANSFERS

We may transfer your personal data outside of the country where you are located, for example, if we are using a service provider based in another country where our group members are located.

Where we transfer your personal data to a country which is not recognised by the UK government or EU Commission (as applicable) as ensuring an adequate level of protection for personal data, we will ensure that relevant safeguards are in place to ensure the adequate protection for your personal data (for example, by entering into standard contractual clauses with the recipients of your personal data).

Further details regarding the relevant safeguards we implement can be obtained from us on request at privacy@jasanwellness.fit with the subject 'international transfers'.

DATA RETENTION

Your personal data will be kept only for as long as is necessary to fulfil the purposes set out in this policy, for as long as we are required to do so by law or any regulatory obligation.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

DATA SECURITY

We take reasonable industry-standard care in keeping all our data secure and in preventing any unauthorised access or unlawful use of it.

COOKIES

We use cookies and similar technologies on the web3wellness App and Jasan wellness Websites for various purposes, including analytics and advertising. For more information regarding our use of cookies, please refer to Annex 2.

YOUR RIGHTS

Depending upon where you are located, you may have the following rights in respect of your personal data under applicable data protection law:

1. To ask us not to process your personal information for marketing purposes. You can exercise your right to prevent such processing (i.e. "opt out") by clicking 'unsubscribe' at the bottom of our marketing emails or by emailing privacy@sweatco.in, with the subject 'unsubscribe'.
2. To change your personal information we hold about you. You can exercise your right by accessing your Account information in our app (Open web3wellness app -> Your Account Screen -> Edit (on Android) or Pencil icon (on iPhone) -> Change your details -> Save).
3. To ask us about the personal information we hold about you and to request a copy of your personal information. You can exercise your right to access this information by emailing privacy@sweatco.in, with the subject 'data access request'.
4. To delete your account and any personal information we hold on you. You can exercise your right to delete your web3wellness account and the personal information attached to it yourself, by triggering an account deletion via the Help section within the web3wellness app (Open web3wellness app -> Your Account Screen -> Settings -> Help -> Contact us -> Choose your problem = Delete Account).
5. To object to any use of your personal data that we carry out on the basis of our legitimate interests (as set out in Annex 1), subject to certain conditions.
6. To receive a copy of the personal data you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person, in each case subject to certain conditions.
7. To withdraw consent to our processing of your personal data if this is based on your consent (as set out in Annex 1).
8. To require us to limit the purposes for which we process your personal data if the continued processing of the personal data in this way is not justified, such as where the accuracy of the data is contested by you.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

If you wish to exercise one of these rights, please follow the steps set out above or contact us using the details set out below.

LINKS

The Services may contain features or links to websites and services provided by third parties. Any information you provide on third-party websites or services is provided directly to the operators of such websites or services and is subject to those operators' policies governing privacy and

security, even if accessed via the web3wellness App or Jasan wellness Websites. We are not responsible for the content or privacy and security practices and policies of third-parties to which links or access are provided through the web3wellness App or jasan wellness Websites. We encourage you to learn about third parties' privacy and security policies before providing them with your personal data.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. Any such changes we may make to this Privacy Policy will be posted on the web3wellness App and Jasan wellness Website(s), and may be emailed to you. Please check the Privacy Policy available on the web3 wellness App and Jasan wellness Website(s) from time to time.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to Privacy@jasanwellness.fit with subject line "enquiry".

ANNEX 1 – PURPOSES OF COLLECTING PERSONAL INFORMATION

We use the following categories of personal data in the manner specified below, and rely on the following legal basis for processing:

Contact Details (phone number): We use this data to verify your identity as part of our account set up procedure. Our legal basis for processing this data is because it is in our and your legitimate interests to ensure that you have used the correct phone number when signing up for the Services.

Contact Details (email address, phone number etc.), profile information (username, profile photo, bio etc.), movement data (motion data, Health Kit data): We use this data to provide the Services, including operating the Jasan wellness Marketplace (using our own systems and those of appropriate third party service providers). Our legal basis for processing this data is based on performance of a contract (our terms and conditions).

Location Data (location data, movement data (Health kit/ Google Fit data, other technical data): We use this data to verify your physical movement and location and issue JW Tokens on the basis of this verified data. Our legal basis for processing this data is based on consent (where we are processing location data) and performance of a contract.

Contact Details (email address, phone number etc.), payment details (card number, CVC etc.), profile information (username): We use this data to process your transactions with us. Our legal basis for processing this data is based on performance of a contract.

Profile Information (username, profile photo etc.), movement data (motion data, HealthKit data): We use this data to create daily leader boards of users, comprising all users or users meeting particular criteria as ranked by the number of steps completed or using other criteria. Our legal

basis for processing this data is because it is in our legitimate interests to make our services social and competitive and allow you to see how you rank against other users and encourage you to walk more.

Contact Details (phone number): We use this data to connect you with other users and allow you to invite contacts to use the Services. Our legal basis for processing this data is because it is in our legitimate interests to make our services social and allow you to interact with friends when using the Services.

Contact Details (phone number, email address etc.), communications data (personal data comprised in your requests, survey responses, complaints etc.): We use this data to respond to queries and complaints and provide you with information and materials that you request from us. We also use this data to communicate with you, including to inform you of updates to the web3wellness App, Jasan Wellness Website(s), our Terms of Use and/or this Privacy Policy. We also use this data to perform market and customer research. Our legal basis for processing this data is because it is in our legitimate interests to respond to your queries and provide any information and materials requested in order to maintain good customer relations; it is in our legitimate interests to ensure that any changes to our policies, terms and other such technical updates are communicated to you; and because it is in our legitimate interests to carry out market and customer research so that we can improve our Services.

Transaction Data and Order History: We use this data to obtain an understanding of your preferences and to maintain accounts and records. Our legal basis for processing this data is because it is in our legitimate interests to understand our users' preferences so we can improve the Services and the offers we display on the web3wellness App; and because it is in compliance with a legal obligation.

Contact Details (phone number, email address, social media accounts), marketing preferences (records of consents): We use this data for Marketing and advertising (including sending you marketing emails, carrying out online behavioural advertising and measuring the effectiveness of our marketing). We also use this data to share your contact details with trusted business partners for marketing purposes. Our legal basis for processing this data is consent (if required under applicable law). Where consent is not required under applicable law, such processing is necessary in our legitimate interests, namely to develop and grow our business.

Profile Information (username, profile photo, bio etc.), usage data, transaction Data, movement data (motion data, Health Kit data): We use this data to investigate and/or prevent suspected fraud or other criminal activities, to investigate disputes between users, and for Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures. Our legal basis for processing this data is because it is in our legitimate interests to resolve and protect our self and users of the Services, the web3wellness App and the Jasan wellness Websites against harmful activities; it is in our legitimate interests to ensure that disputes between users are resolved and appropriate action is taken against users breaching the rules; and because it is in our legitimate interests to be as efficient as we can so we can deliver the best services to you.

Profile Information (username, profile photo, bio etc.), usage data, technical data): We use this data to correct errors and problems with the Services, and to protect the security of systems and data. Our legal basis for processing this data is because it is in our legitimate interests to monitor

the Services to ensure that it functions properly and is secure; to comply with our legal and regulatory obligations; and because it is also in our legitimate interests to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.

Technical Data and Usage Data: We use this data to analyse the usage of the Services, including for the purposes of improving the Services and to ensure that content is presented in the most effective manner for you. Our legal basis for processing this data is based on consent.

Contact Details (email address, phone number etc.), **profile information** (username, profile photo, bio etc.): We use this data to enforce legal rights or defend or undertake legal proceedings. Our legal basis for processing this data is because it is in our legitimate interests or those of a third party, i.e. to protect our business, interests and rights or those of others.

ANNEX 2 – COOKIES

What are cookies

We use cookies to distinguish you from other users of the web3wellness App and Jasan wellness Website(s) and obtain certain information about your usage and behaviour. A cookie is a small file of letters and numbers that we put on your computer when you use the web3 wellness App or Jasan wellness Website(s). This helps us to provide you with a better experience when you use the web3wellness App or browse the Jasan wellness Website(s) and also allows us to improve the Services. We will use both persistent cookies, which could remain on your device until their expiration (which, in some cases, is up to 10 years), and session cookies, which are temporary files removed from your device once your browser is closed.

Cookies we use

The types of cookies we may use include:

- **Strictly Necessary Cookies**, which are required for the operation of the web3wellness App and Jasan wellness Websites. They include, for example, cookies that enable you to log into secure areas of our websites;
- **Analytical/Tracking Cookies**, which allow us to recognise and count the number of visitors and analyse use of the Services, as well as to verify transactions; and
- **Advertising and Retargeting Cookies**, which allow us to generate appropriate advertising directed to you on the Jasan Wellness Website(s) as well as on the web3wellness App and other third party websites.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. You may block cookies by activating the appropriate setting on your browser but, if you do so, you may not be able to use all functionalities of the Services.

We use a number of industry-standard data analytics tools, such as Google Analytics and Facebook Analytics. These collect certain information about you, such as your device's IP address and browsing and usage behaviour, and are used to allow us to track and monitor the traffic visiting the web3wellness App and Jasan wellness Website(s).

Consent to use cookies

We will ask for your permission (consent) to place cookies on your device when using the Jasan wellness Websites, except where these are essential for us to provide you with a service that you have requested.

There is a notice on our home page which describes how we use cookies and requests your consent before we place any non-essential cookies on your device.

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of our websites.

To find out more about cookies, including how to see which cookies have been set and how to manage and delete them, you can visit the third party website: www.allaboutcookies.org