

Privacy Policy

Last Updated: April 21, 2024

A. Scope of this Privacy Policy

This Privacy Policy (“**Privacy Policy**”) explains how we, Eirene Wellness Innovations (“**we**,” “**us**,” or “**our**”), collect, use, share, or otherwise process information that we collect through our services. These services include, as applicable, our website, mobile application, social media pages, marketing activities, and other activities described in this Privacy Policy, or when other businesses provide us with your personal information (collectively, the “**Services**”).

This Privacy Policy applies to all Eirene Wellness Innovations Services. We may provide additional or supplemental privacy statements for certain products or services. This Privacy Policy is issued in conjunction with Eirene Wellness Innovations’ Terms of Service (located at: <https://eirene.b-cdn.net/Eirene%20-%20Terms%20of%20Service.pdf>) (the “**Terms of Service**”), the terms of which are incorporated by reference into this Privacy Policy (collectively, the “**Agreement**”). Any capitalized terms that are not defined herein shall have the same meaning as defined in the Privacy Policy.

This Privacy Policy describes our privacy practices when we process:

- Personal and financial/billing information for the purposes, e.g., of administering and processing the Services; and
- Personal information, as necessary, to manage, run, improve, and develop our Services and personalize your experience while interacting with the Eirene Wellness Innovations Platform. Depending on your settings, this may include showing you personalized ads or recommending certain Eirene Wellness Innovations products based on your interests.

Eirene Wellness Innovations does not intend to collect Personally Identifiable Information (“**PII**”) from its users/clients, but as part of its provision of the Services, we may collect PII, and we will safeguard it in accordance with applicable laws. Accordingly, this Privacy Policy further serves as notice to you regarding how we use, disclose, and protect your PII.

DISCLAIMER: THE INFORMATION AND ADVICE INCLUDED OR OFFERED ON EIRENE WELLNESS INNOVATIONS’ WEBSITE, APP, OR AS OTHERWISE PART OF THE SERVICES, IS NOT INTENDED TO BE USED AS MEDICAL ADVICE. NO MATERIALS OR INFORMATION HEREIN ARE INTENDED TO BE A SUBSTITUTE FOR PROFESSIONAL MEDICAL ADVICE, DIAGNOSIS, OR TREATMENT. ALWAYS SEEK THE ADVICE OF YOUR PHYSICIAN OR OTHER QUALIFIED HEALTHCARE PROVIDER WITH ANY QUESTIONS YOU MAY HAVE REGARDING A MEDICAL CONDITION OR TREATMENT.

By using the Services, you explicitly consent to both the Privacy Policy and the Terms of Service. **IF YOU DO NOT AGREE TO ABIDE BY THE DATA PRACTICES DESCRIBED IN THIS PRIVACY POLICY OR TO THE TERMS SPECIFIED IN THE TERMS OF SERVICE, THEN PLEASE CLOSE YOUR BROWSER OR APP IMMEDIATELY AND DO NOT USE OR ACCESS THE SERVICES.**

B. The Eirene Wellness Innovations Platform/Services

The Eirene Wellness Innovations Platform and your personal information

When we say “**Platform**”, we mean Eirene Wellness Innovations’ website and mobile application platform, as noted in the Terms of Service, but we also mean that when you choose to share data with us, or bring over information from third parties, Eirene Wellness Innovations uses that data together as part of, and as a means to provide, the Services. The personal information we use in this centralized way may relate to you as an end user of our Services whose personal information has been included in the Eirene Wellness Innovations Platform.

Personal information we collect

The personal information that we collect or otherwise receive about you depends on the context of your interactions with Eirene Wellness Innovations, how you configure your account, the Services you request, and the choices you make, including your privacy settings. The way we process your personal information may also depend on the particular Services, functionalities, or experiences you use, your location, and applicable law.

Information you provide to us

You may provide us with your personal information as follows:

- Contact data and account profile data. We collect information when you create an account, activate a subscription, and/or upload information to the Eirene Wellness Innovations Platform. Personal information may include your name, previous name(s) and/or nicknames, title and honorifics, professional title and company name, billing and mailing addresses, phone number, and email address, profile photo, billing information (your payment information), purchase history, demographic information, preferences, subscription data, and your username and account credentials.
- PII. We may collect information—including your name, date of birth, and/or similar information—to verify your identity or receive other Services from Eirene Wellness Innovations.
- Communications, feedback and survey data, and related data. When you reach out to us for support, give us feedback, participate in optional surveys, participate in product research or training, or otherwise interact or communicate with us, we may collect personal information, such as your name, email address, telephone number and any other personal information you choose to share. This information may include: chat and text records, photographs, and video images, and you explicitly consent to our use of such methods.
- Marketing data. You may provide us with your contact information and preferences for receiving our marketing communications.
- Device and contact data. If you grant permission in your device settings, certain features may have access to your device and contacts.

Automatic data collection

We may automatically log personal information about you, your computer or mobile device, and your interaction over time with the Services, such as:

- Device information. We may collect information about your device(s), such as IP addresses, log information, error messages, device type, and unique device identifiers. For example, we may collect IP addresses from you as part of our sign in and security features.
- Usage information. We may collect information about your use of the Eirene Wellness Innovations Services, such as the pages you viewed, the services and features you used or

interacted with, your browser type, and details about any links or communications with which you interacted.

- Information stored locally. Some of our web-enabled desktop services and offerings synchronize with the information on your computer. In doing so, we may collect information such as device information, product usage, and error reports. We may also store personal information locally on your device.
- Communication interaction data. We or our third-party service providers may collect information from email providers, communication providers, and social networks, such as your interactions with our email, text, or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.
- Online behavioral data. We may automatically collect certain personal information about your use and interactions with our website, mobile application, social media websites, and marketing campaigns that we or our customers organize, including device information, page view information, and search results.

Cookies and similar technologies

- Eirene Wellness Innovations may use commonly used tools, such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, “**Cookies**”), to collect information about you (“**Cookie Information**”) so that we can provide the experiences you request, recognize your visit, track your interactions, and improve your and other customers’ experiences. You have control over some of the information we collect from Cookies and how we use it.

C. How We Use Personal Information

We may use your personal information in a number of ways or as otherwise described at the time of collection:

Service delivery and operations

We may use your personal information to:

- Provide you with the Eirene Wellness Innovations Services, create your account, and manage our relationship with you;
- Run and manage our business, including resolving billing and financial disputes;
- Evaluate your eligibility for marketing offers, products, and services;
- Provide features to you;
- Provide a product or service that you have requested through the Eirene Wellness Innovations Platform;
- Communicate with you, such as sending you electronic notifications concerning your financial privacy;
- Understand your needs and interests, and personalize your experience with the Services and our communications;
- Provide you with support and resolve disputes; and/or

- Authenticate your identity.

Research and development

We may use your personal information to:

- Improve and develop our Services by analyzing how they are used and interacted with, as well as by assessing your use of and interactions with our Platform and certain content you send or display through the Platform, including by conducting data analytics to develop insights about you, your needs, and your preferences, so we can make more informed predictions, recommendations, and products for our customers; and
- Combine and anonymize information about your interactions with Eirene Wellness Innovations to create aggregate, anonymized statistics for use in research, and for marketing, promoting, improving, and developing our platform.

Marketing and advertising

We, our service providers, and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes to:

- Market services, products, and experiences, as well as other, non-transactional communications via email, post, telephone, SMS, or push notifications, in accordance with your marketing preferences;
- Personalize your experience and tailor recommendations, advertising, and offers presented to you, including through the development of insights about you and your needs based on your interactions with the Eirene Wellness Innovations Platform's products, services, and offerings.

Compliance and protection

We may use your personal information to:

- Protect against misuse or abuse of our Services and ensure compliance with our Terms of Service, including in relation to content our customers send or display through the Platform;
- Comply with legal and regulatory requirements;
- Protect the rights, property, safety, or security of the Eirene Wellness Innovations Platform, our customers, employees, or others, and prevent fraudulent or illegal activity;
- Exercise our rights in the course of judicial, administrative, or arbitration proceedings;
- Enforce, remedy, or apply our Terms of Service or other agreements.

Automated processing

To provide you with valuable personalized advice, recommendations, and experiences, we may process your personal information using automated and manual (human) methods. Our automated methods include a range of technologies that help our services learn and reason to improve our ability to personalize and enhance your experience in the Eirene Wellness Innovations Platform.

D. How We Share or Disclose Your Personal Information

Eirene Wellness Innovations does not sell your PII, and Eirene Wellness Innovations does not disclose your PII to any third party unless (i) it has received consent from you to do so; or (ii) it is permitted to do so by law.

Eirene Wellness Innovations may share your personal information with third parties in the following circumstances:

- For research. With appropriate controls, we may share information with third parties, such as academic institutions, government and non-profit organizations, for research purposes, or to publish academic or policy-related materials. We only share information in a way that does not identify any individual.
- For mergers and acquisitions. If we are involved with a merger, asset sale, financing, liquidation, bankruptcy, or the acquisition of all or part of our business to another company, we may share your personal information with that company and its, e.g., legal and financial advisors before and after the transaction date.
- For advertising and analytics. Eirene Wellness Innovations may use advertising networks and other providers to display advertising on our Eirene Wellness Innovations Platform or to manage our advertising on other sites. Our advertising partners may place Cookies on unaffiliated websites in order to serve advertisements that may be relevant to you based on your browsing activities and interests and determine the effectiveness of such advertisements.

For legal reasons

We may share your personal information with third parties for legal reasons without your consent, and as permitted by law, including:

- When we reasonably believe disclosure is required in order to comply with a subpoena, court order, or other applicable law, regulation, or legal process;
- To protect the rights, property, or safety of Eirene Wellness Innovations, the Eirene Wellness Innovations Services, our customers, or others;
- To enforce, remedy, or apply our Privacy Policy, Terms of Service, or other agreements;
- To prevent fraud, cybersecurity attacks, or illegal activity, or to protect or defend against same;
- For debt collection; and
- With regulatory agencies, including government tax agencies, as necessary to help detect and combat fraud and/or protect our customers, users, and/or the Eirene Wellness Innovations Platform, or in required institutional risk control programs.

E. Your Personal Information Rights and Choices

Your choices

We believe that you have choices about how we collect, store, and disclose information that pertains to you or your PII, and, pursuant to state and/or federal law—you may have additional rights beyond what is listed herein.

We provide all customers with options to manage the privacy of their personal information. For example, you may update your privacy settings by visiting your account settings, and you can edit and correct certain personal information at any time by changing it directly within our Services.

Delete your personal information.

You may ask us to delete your personal information and/or you may opt out of interest-based advertising by visiting your account settings or emailing us at privacy@Eireneapp.com

Verification

To help protect privacy and the security of your personal information, you may be asked to provide additional information to verify your identity and/or ownership rights before we can fulfill your data rights request. If we cannot verify your identity or your ownership rights to the data, we may not be able to service your request until you provide proper documentation.

Data retention

Unless you specifically ask us to delete your personal information, we retain your personal information as long as it is necessary to comply with our data retention requirements and/or as required by law. Even if you submit a deletion request, we may be required to maintain your personal information for as long as necessary to:

1. comply with our legal or regulatory compliance needs (e.g., maintaining records of transactions you have made with us);
2. to exercise, establish, or defend legal claims; and/or
3. to protect against fraudulent or abusive activity on our service.

This means we may keep different information for different periods. If your account is canceled due to inactivity, we may delete this information immediately.

There may be occasions where we are unable to fully delete, anonymize, or de-identify your personal information due to technical, legal, regulatory compliance, or other operational reasons. Where this is the case, we will take reasonable measures to securely isolate your personal information from any further processing until such time as we are able to delete, anonymize, or de-identify it.

State privacy laws

If you are a citizen of the State of, e.g., California, Colorado, Connecticut, Virginia, or Utah, then you may have additional privacy rights that are not listed herein, including, e.g., the right to correction and deletion; the right to access all privacy information of yours that we have collected, etc. You are encouraged to research the privacy rights and protections that may be applicable to you—regardless of your state of domicile—and to stay apprised of such rights.

If you have any explicit questions about such rights or wish to enforce any of your legal rights, please contact us at privacy@Eireneapp.com with as much specificity and detail as possible, and we would be happy to assist you.

Storage of your data

Your data is stored in the United States and protected under strict firebase security rules. Your information may also be stored in Log files on Eirene Wellness Innovations' server.

Eirene Wellness Innovations reserves the right to store and process your personal information in the United States and in any other country, as permitted by applicable laws and regulations, and in our sole discretion. Some of these countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective).

When we transfer, store, or process personal information outside of your jurisdiction, we take appropriate safeguards to require that your personal information remain protected in accordance with this Privacy Policy and applicable law.

Security of your personal information

We use reasonable physical, technical, and organizational safeguards that are designed to protect your personal information. However, despite these controls, we cannot completely ensure or warrant the security of your personal information.

Changes to our Privacy Policy

From time to time, we may change or update our Privacy Policy. We reserve the right to make changes or updates at any time in our sole discretion. If we make material changes to the way we process your personal information, we may notify you by, e.g., posting a notice within the Eirene Wellness Innovations Platform; by sending you a notification; or by other means consistent with applicable law.

Services are not intended for minors

Our services are not intended for or directed to children under the age of 18. We do not knowingly collect personal information from children. If you believe we may have information from a child, please contact us at privacy@eireneapp.com

Liability Waiver

By using our Services, you explicitly agree to the terms herein, and, accordingly, you further agree to release and forever discharge us from any claim whatsoever which arises or may hereafter arise on account of any service rendered or program provided by us to you.

Please e-mail any general or specific inquiries to us at: privacy@eireneapp.com.