

PRIVACY POLICY

Last update: November 16, 2022

The Privacy Policy explains how Palta Weather, Inc., a Delaware corporation, (further will be referred to as “**we**” or “**us**”) collects, stores, uses and protects your Personal Data in connection with usage of our website weatherwell.app and our application WeatherWell: Health Forecast ® (together referred to as the “**Services**”). The Privacy Policy also explains your personal data protection rights, and we are happy to help you exercise them. Your privacy is of absolute value, so we do our best to ensure it from our side.

The Privacy Policy is an integral part of the Terms of Use. Please read them carefully before you start using our Services.

1. What data do we collect and why?

When you use our Services, we may collect the following data about you:

Data category	Collection means	Purpose of collection and processing	Legal basis for collection and processing (GDPR)
Technical information, including: <ul style="list-style-type: none">• hardware model;• device type;• unique device identifiers;• operating system;• IP address,• geolocation;• time zones;• information on your wireless and mobile network connection.	Collected automatically	We use such information while analyzing error reports and performing error correction	Art. 6.1 (f) – we have a legitimate interest to process these data
		We use such information for analytics purposes in order to improve our Services	
Login and credentials (email, name and password) you use to sign in the application	You provide it to us	This information is used for signing in the application and for user identification	Art. 6.1 (b) – we perform our contractual obligations

Your Facebook / Google / Apple ID or MagicLink login details if you choose to sign in using the above services. Such data may also include your use of our application on such public forums, including with whom you share our application.			
Your name and your photo	You provide it to us	We will process this data for the purpose of your account identification and personalization	Art. 6.1 (b) – we perform our contractual obligations
Your name and e-mail	You provide it to us	We may use such information to process your requests	Art. 6.1 (b) – we perform our contractual obligations
		We may use it for email communications (other than for marketing purposes). You opt-out from receiving emails from us any time by contacting us at info@weatherwell.app	Art. 6. (f) – we have a legitimate interest to process these data
Your name and e-mail	You provide it to us	We may request such information in order to prove your identity in certain cases	Art. 6.1 (c) – we have a respective legal obligation
Your health and wellbeing data	You provide it to us	We process this information to provide you with better insights on the way	Art. 6.1 (b) – we perform our contractual obligations

		weather may influence your daily life. These data may also be repurposed for the research purposes (see below).	(with your consent to process sensitive data)
Your age	You provide it to us	We process this information to verify your eligibility	Art. 6.1 (b) – we have respective contractual obligations
		We process this information to provide you with more personalized experience	Art. 6. (f) – we have a legitimate interest to process these data
Your gender	You provide it to us	We process this information to provide you with better insights and more personalized experience	Art. 6. (f) – we have a legitimate interest to process these data
Your health and wellbeing data Your age Your gender	You provide it to us	<u>Subject to your consent</u> in certain circumstances for the purpose of providing services to you, we may repurpose these data to be used for research purposes. The aim of the research is to investigate possible correlations and reliable associations between symptoms and variety of weather conditions both on the individual level and at large user groups.	Art. 6. (f) – we have a legitimate interest to process these data

<p>Your email Your age Your gender Your use of our Services</p>	<p>You provide it to us</p>	<p>We may use these data in marketing purposes: namely, to contact you in case we want to invite you for an interview in order to improve our Services</p>	<p>Art. 6 (a) – we receive your consent for processing of these data</p>
<p>Your email Your use of our Services</p>	<p>You provide it to us</p>	<p>We may contact you in marketing purposes: namely, to ask for a survey completion evaluating our Services</p>	<p>Art. 6 (a) – we receive your consent for processing of these data</p>
<p>Your email</p>	<p>You provide it to us</p>	<p>We may contact you in marketing purposes: namely, to tell about our new features, to share our content, describe the updates and let you know about any ongoing promotions and/or bonuses</p>	<p>Art. 6 (a) – we receive your consent for processing of these data</p>
<p>Your usage activity</p>	<p>Collected automatically</p>	<p>We process these data for analytics purposes and to improve our Services</p>	<p>Art. 6. (f) – we have a legitimate interest to process these data</p>
<p>Date of birth Body mass Height Biological sex Step count Sleep analysis</p>	<p>Collected from Apple Health</p>	<p>If you allow us to collect these data from your Apple Health account, we will process the data to provide you with more personalized insights about the ways the weather may influence you</p>	<p>Art. 6.1 (b) – we perform our contractual obligations</p>

All the above data are collectively referred to in this Privacy Policy as “**Personal Data**”.

While visiting our website, we may also use cookies. For more on the way we deal with cookies please read our Cookie Notice.

2. How long do we retain your Personal Data?

We retain your Personal Data for no longer than is necessary for the purposes of its collection and processing – e.g., for as long as your account is active or as needed to provide services to you, unless we are required to retain your Personal Data for a longer period due to the applicable legislation requirements, any ongoing dispute resolution or in order to enforce our agreements.

3. What are your data protection rights?

We want to make sure that you are fully aware of all your data protection rights and the ways you can exercise them. You are entitled to the following:

- 3.1 The right to access.** You can ask us for a confirmation that we process your Personal Data with the information related to its processing.
- 3.2 The right to data portability.** You can request that we provide you with your Personal Data in a structured and portable format. Apart from that, you can ask us to transmit those data to another controller directly, where technically feasible.
- 3.3 The right to correction.** You can ask us to correct your Personal Data if you believe that it might be inaccurate.
- 3.4 The right to erasure.** You may ask us to erase your Personal Data upon your withdrawal of the consent to processing if you believe that such processing is unlawful. You may also ask us to erase your Personal Data in some other cases indicated in art. 17.1 of the GDPR. Please note that erasure of your Personal Data may affect your use of our Services.
- 3.5 The right to restrict processing.** You can request a restriction of your Personal Data processing if you contest the accuracy of your Personal Data
- 3.6 The right to object to processing.** You can object to the processing of your Personal Data that is processed under certain legal bases - for example, the data that we process under the legitimate interest basis. Please note that in case your data is processed for the purposes of direct marketing, you can always object to such processing without providing any justification.
- 3.7 The right to lodge a complaint** with your local data protection supervisor. You can do so in case you believe that our activities are not compliant with the applicable data protection regulations. However, if you have such concerns about our data protection activities, we would kindly ask you to first contact us at info@weatherwell.app and we will do our best to ensure proper handling of your Personal Data.

If you wish to exercise any of the rights 3.1 – 3.6 above, please contact us at info@weatherwell.app and describe your request in the plain language. If you make a request, we have 30 calendar days to make respective actions in connection with your

request. In case we need any more time to help you exercise any of your rights, we will let you know.

In case your request is vague or unclear, we may engage into a conversation with you in order to better understand your request. We may also refuse manifestly unfounded and excessive requests.

We might ask you to prove your identity while exercising your data protection rights. This is made to ensure that you are indeed entitled to receive certain information and that no rights of third parties are violated by your request.

4. Security measures

We take the protection of your Personal Data very seriously and take all reasonable and appropriate measures to protect them from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organizational security measures.

Please understand that no security system is perfect and, as such, we cannot guarantee the absolute security of the Services, or that your information won't be intercepted while being transmitted to us. In case your Personal Data got compromised due to a security breach, we will act promptly to identify the cause and take all reasonable steps to remedy the breach. We will inform you of the incident, if necessary, in connection with the applicable legislation.

If you want to report a security incident related to our Services, please contact us at info@weatherwell.app.

5. Children's privacy

We are committed to protecting the privacy of children. We do not knowingly collect Personal Data of any person under the age of 13 (of 16 years old for the residents of the European Union). If you are aware of anyone under 13 (or 16 years old for the residents of the European Union) using the Services, please contact us at info@weatherwell.app, and we will take the required steps to delete such information and (or) delete the account. Please do not use our Services if you are below 13 years old (or 16 years old for the residents of the European Union).

6. Sharing of your Personal Data

We share your data with our affiliated entities that are members of Palta group. These entities function as data processors to provide the Services. The list of the entities is below:

- **Palta People Ltd** – located in Cyprus.
- **Palta Poland sp. z o.o.** – located in Poland.
- **Palta UK Ltd** – located in the UK.

We, or Palta group as our data processors, also use external service providers to process your Personal Data on our behalf. When we engage such data processors, we have appropriate agreements in place to protect your data. In the case of international transfers, we always make sure that additional safeguard mechanisms are in place (for example, by adding Standard Contractual Clauses).

Currently we share your Personal Data with the following external service providers:

- **Amazon Web Services, Inc (AWS)** – AWS stores your Personal Data when you use our application. Amazon Web Services, Inc. is located in the USA.
- **Amplitude, Inc.** – we use Amplitude to understand how you use our Services, engage with its particular features and what you like most about our Services. Amplitude, Inc. is located in the USA.
- **Palta Software Ltd. (Palta Brain)** – Palta Brain is an analytics tool that helps us understand your preferences in our Services usage and to improve your digital experience. Palta Software Ltd. is located in Cyprus.
- **Appsflyer, Inc.** – with your consent or otherwise in accordance with this Privacy Policy, we may share your information with Appsflyer Inc. Appsflyer is a mobile marketing platform. We share with them statistical data about the use of our Services, and via this platform we are able to reach more people who might be interested in our Services. Appsflyer, Inc. is located in the USA.
- **RevenueCat, Inc.** – we use the service RevenueCat to implement and analyze in-app subscriptions. RevenueCat. Inc. is located in the USA.
- **Apple, Inc.** – collects and processes subscription payments, if you choose to. Apple, Inc. is located in the USA.
- **Google LLC, USA** – collects and processes subscription payments, if you choose to. We also use a Google Analytics tool Firebase for analytics purposes in order to analyze your usage of our Services. Google LLC, USA is located in the USA
- **Auth0, Inc.** – processes data needed for identification and verification of the users. Auth0, Inc. is located in the USA.
- **Braze, Inc.** – a customer engagement platform used from multichannel marketing. Braze, Inc. is located in the USA.
- **Facebook, Inc.** – Facebook processes data needed for initialization (e.g., session start, OS version, device data). Facebook, Inc. is located in the USA.
- **Vercel, Inc.** – Website hosting. We use it for our blog webpage. Vercel, Inc. is located in the USA.

We may also share your information during corporate transactions that we are engaged into (such as merger or acquisition of our business) or if such share is required under the applicable legislation.

No sale of Personal Data. We will never sell, rent, or disclose your Personal Data. We may share only some of your Personal Data to our service providers strictly limited to cases and purposes stipulated in this Section.

7. Changes to our privacy policy

We review our policies and practices regularly to reflect any changes in our collection, processing, sharing or retention procedures as well as any regulatory changes. You can always find the up-to-date version of our Privacy Policy on our website with the indication of the last update date.

8. Contact Us

You can contact us using the following email: info@weatherwell.app

You can also contact our EU representative:

DPOEU LTD, Office 902, Oval, Krinou 3, Ayios Athanasios, 4103, Limassol, Cyprus
Email: info@dpoeu.eu