

## **PRIVACY POLICY**

Protecting your private information is our priority. This Statement of Privacy applies to wenoexchange.com and WENO Exchange LLC (“WENO”) and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to WENO include wenoexchange.com (“Website” or “Site” or “Sites”). WENO is an E-Prescribing network which offers various services to the healthcare world. By using the Site(s) you consent to the data practices described in this statement.

### **Collection of your Personal Information**

WENO may collect personal information, including but not limited to:

- Full Name
- Job Title
- Professional or Personal Identifiers
- Gender
- Phone Number
- Email
- Address (Work and/or Home)
- Date of Birth
- Credit Card Information for our 3<sup>rd</sup> Party Processor

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services available on the Site. These may include: (a) registering for an account on our Site; (b) entering information for a link sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or other payment information on the Site. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

### **Sharing Information with Third Parties**

WENO takes its responsibility to safeguard your personal data seriously. To that end, WENO does not sell, rent or lease its customer lists to third parties.

WENO may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or to enhance experience of its services. All such third parties are prohibited from using your personal information except to provide these services to WENO, and they are required to maintain the confidentiality of your information.

WENO may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on WENO or the Site; (b) protect and defend the rights or property of WENO; and/or (c) act under exigent circumstances to protect the personal safety of users of WENO, or the public.

### **Tracking User Behavior**

WENO may keep track of some user behavior within the Website, in order to determine what WENO services are the most popular. This data is used to deliver customized content and advertising within WENO to customers whose behavior indicates that they are interested in a particular subject area.

### **Automatically Collected Information**

Information about your computer hardware and software may be automatically collected by WENO. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the WENO website.

### **Use of Cookies**

The Website may use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the server that you have returned to a specific page. This simplifies the process of recording your personal information, such as billing addresses, and login information for example. When you return to the Site, the information you previously provided can be retrieved, so you can easily use the WENO features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the WENO services or websites you visit.

### **Links**

This Website may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

### **Security of your Personal Information**

WENO secures your personal information from unauthorized access, use, or disclosure. WENO uses the following methods for this purpose:

- SSL Protocol
- Automatic lockout after a number of failed log in attempts
- Authentication with complex password requirements
- Automatic timeout settings for inactivity

When personal information (such as name and date of birth) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol.

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

You hereby acknowledge that WENO is not a health or medical provider. WENO is a Business Associate, as defined under the Privacy, Security, Breach Notification, and Enforcement Rules at 45 CFR Part 160 and Part 164 (“HIPAA”), and WENO maintains reasonable security measures - including encryption, granular access controls, and privacy and security training - to protect against the loss, misuse, and alteration of information on its Platform, in accordance with HIPAA. However, it is not possible to guarantee the security or integrity of information disclosed online. As no data transmission over the Internet is completely secure, we urge you to take every precaution to protect your personal data when you are sending Personal Information on the Internet. Because no physical or electronic security is impenetrable, by using the Site, you agree to assume all risks in connection with the information sent to us or collected by us when using the Site.

### **Children under Thirteen**

WENO does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you are not allowed to use the Site.

### **E-mail Communications**

From time to time, WENO may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication.

### **External Data Storage Sites**

We may store your data on servers provided by third party hosting vendors with whom we have contracted.

### **Designated Countries Privacy Rights**

This Section only applies to Users and Customers of the Services that are located in the European Economic Area, United Kingdom and/or Switzerland (collectively, the “Designated Countries”) at the time of data collection. We may ask you to identify which country you are located in when you use some of the Services, or we may rely on your IP address to identify which country you are located in. Where we rely only on your IP address, we cannot apply the terms of this Section to any User or Customer that masks or otherwise obfuscates their location

information so as not to appear located in the Designated Countries. If any terms in this Section conflict with other terms contained in this Policy, the terms in this Section shall apply to Users and Customers in the Designated Countries.

WENO is a data controller with regard to any personal information collected from Customers or Users of its Services. A “data controller” is an entity that determines the purposes for which and the manner in which any personal information is processed. Any third parties that act as our service providers are “data processors” that handle your personal information in accordance with our instructions.

You may object to our processing at any time and as permitted by applicable law if we process your personal information on the legal basis of consent, contract or legitimate interests. We can continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.

If we process your personal information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your personal information in a structured, commonly used and machine-readable format, and to have us transfer your personal information directly to another “controller”, where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others.

If you believe we have infringed or violated your privacy rights, please contact us at [support@wenoexchange.com](mailto:support@wenoexchange.com) so that we can work to resolve your concerns. You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence, place of work, or place of alleged infringement.

### **Changes to this Statement**

WENO reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and/or by updating any privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

### **Contact Information**

WENO welcomes your questions or comments regarding this Statement of Privacy. If you believe that WENO has not adhered to this Statement, please contact us at [support@wenoexchange.com](mailto:support@wenoexchange.com).

Effective as of June 8, 2019