



PRIVACY POLICY

EFFECTIVE 08-17-23

Protecting your private information is our priority. This Privacy Policy describes how WENO Exchange LLC and its affiliates (collectively “WENO”) collect and process your personal information through the WENO website, various online services and applications that reference this Privacy Policy (together, the “WENO Services”). By using a WENO Service, you are consenting to the data practices described in this Privacy Policy.

Personal Information WENO Collects About Users

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

- Full Name
- Employer and/or Job Title
- Professional and Personal Identifiers
- Gender
- Phone Number(s)
- Email(s)
- Address (Work and/or Home)
- Date of Birth / Age
- Credit Card Information for our 3rd Party Payment Processor
- Location information
- Your IP address
- As provided in voice recordings when you leave us a message
- Payment and credit history information
- As provided in content of emails or support tickets sent to us
- Other people’s contact data from your Weno Mail (secure messaging) address book

Voluntary & Compliance Collection

We do not collect any personal information that is not voluntarily provided to us by you or on your behalf for your use of WENO Services. We may collect your personal information when verifying your information provided us or to satisfy compliance to a law or a WENO Service requirement. If you choose not to provide the required personal information, you will not be able to take advantage of WENO Services. These may include: (a) registering for an account; (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. We also may gather additional personal or non-personal information in the future in this manner.

Automatically Collected Information

Information about your computer hardware and software may be automatically collected by WENO to track user behavior while using our Services or website in order to block unauthorized traffic, for operation purposes, to maintain quality, to provide general statistics regarding use, or to deliver customized content. This information can include: activity logs, your IP address, browser type, domain names, access times, and information about referring website addresses.

Use of Cookies

WENO 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.

How We Use Your Personal Information

We only use your personal information to operate and improve the services that we offer. These purposes include:

- **Delivery of services.** We use your personal information to perform our services, process payments, and communicate with you about WENO Services and promotional offers.
- **Troubleshoot and Improve WENO Services.** We use your personal information to provide functionality, review and analyze performance, fix errors, and improve the user experience and overall effectiveness of WENO's Services.
- **Legal Compliance and Government Standards.** We collect and use personal information to comply with applicable laws, regulations, a legal process, an enforceable government request, or industry standards.
- **Network Directories.** As an ePrescribing network, we use certain personal and professional information to populate our network directories in order for participants to know how to send or receive various transactions WENO's Service support.
- **Advertising.** In certain cases, we use your personal information to display ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads. If you do not want us to use your personal information in this manner, an account administrator user of your account can authorize and pay for an upgrade for users that wish to have

an advertisement free experience. This is done in the Manage User Page of Your Account.

- **Prevent Fraud and Credit Risk.** We may use scoring methods to assess and manage credit risks when applicable to your account. We also use personal information to protect the security of our customers, WENO, and others by using personal information to prevent and detect fraud and abuse.

Do We Share Your Information

WENO takes its responsibility to safeguard your personal data seriously. To that end, WENO is not in the business of selling our customer's personal information to others. We only share a user's personal information with others only as described below and when they are subject to follow practices at least as protective as those described in this Privacy Policy.

Transactions Involving Third Parties: WENO may make available to you certain services, products, applications, or skills that are provided by third parties for use on or through our services. We use other companies and individuals to perform functions related to our services on our behalf, including but not limited to, third party marketing and advertising entities or external data storage sites or hosting services.

Conducting or Transfer of Business: As an ePrescribing network, we provide network participants with the information they need to communicate with others that in the network. If WENO is acquired then customer information will be one of the transferred assets. If we buy other businesses or services, the transaction may require the transfer of customer information.

Protection/Problem Solving: 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, regulation, or comply with legal process or binding agreement; (b) protect and defend the rights, interest, or property of WENO; and/or (c) act under exigent circumstances to protect the personal safety of users of WENO, or the public; (d) take appropriate action for violations of a law, regulation, or wrongful use of our Services, or (e) resolve problems, respond to inquiries,

WENO will provide you with notice and the right to refuse to share information with third parties when it is for a reason not stated above.

Links

WENO's Services 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:

- During transmission we use encryption protocols and software.
- We do not store your credit card data. It is stored by a third-party credit card processor that follows the Payment Card Industry Data Security Standard (PCI DSS) for handling credit card data.
- We maintain physical, electronic, and procedural safeguards when collecting, storing, and disclosing a customer's personal information.

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 through WENO's Services 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 WENO's Services, you agree to assume all risks in connection with the information sent to us or collected by us.

Children under Thirteen

WENO's Services are for adults and legal entities and does not offer any services to children. WENO does not knowingly collect personally identifiable information from children users that are under the age of thirteen. If you are under the age of thirteen, you are not allowed to use WENO's Services.

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.

What Information Can You Access

You can access the personal information used for registering for WENO Services by requesting this information from an administrator user of your account.

Your Privacy Rights

If you need to contact our Security and Privacy Officer email admin@wenoexchange.com about this Privacy Policy, your rights, or other privacy concerns.

California Privacy Rights. If you are a resident of the State of California, under the California Consumer Privacy Act of 2018 (CCPA), you have the following rights:

1. The right to access the personal information we collect and request a copy, which is subject to certain restrictions;
2. The right to access personal information we sell or disclose to third parties and to request a copy, which is subject to certain restrictions;
3. The right to request that we delete information we collect about you, but this is subject to certain restrictions; and
4. The right to be free from discrimination for exercising your rights under the CCPA.

EU 2016/679. Per the General Data Protection Regulation (EU) 2016/679, if you are a data subject, you may contact our Security and Privacy Officer for the following reasons, only after we authenticate your identity:

1. To ask for a copy of your data;
2. To request that we delete or stop processing your data;
3. To ask us to edit any incorrect or incomplete data we have for you; and
4. To tell us about any concern or objections you have about our use of your data.

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 Privacy 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 our Security and Privacy Officer as stated above, 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 either sending a notice to the primary email address specified in your account, or by placing a prominent notice on our applications or site(s), and/or by updating any privacy information on this page. Your continued use of WENO’s Services after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.