



PRIVACY POLICY

EFFECTIVE 09-19-2024
LAST UPDATE 09-19-2024

WENO Exchange LLC (collectively, “WENO,” “we,” “us,” or “our,”) is committed to protecting the personal information we have about our business client’s staff, our vendor’s staff, and as long as personal accounts exists, for personal account holders. This Privacy Policy describes what personal information we collect, how we collect and use personal information, who we disclose it to, the measures we take to protect personal information, and the choices you have regarding our use of your personal information.

Table of Contents

- PRIVACY POLICY 1
- Effective Date and Changes..... 1
- What is In Scope for this Privacy Policy 1
- What is Not in Scope for this Privacy Policy 2
- Categories of Personal Information WENO Collects, Discloses, or Sales To..... 2
- Sources We Collect Personal Information From 5
- Use of Cookies & Tracking Technologies..... 5
- How We Use Your Personal Information..... 5
- How Long We Retain Personal Information 6
- Security of your Personal Information..... 6
- What Information Can You Access 7
- Region Specific Privacy Rights 7
- How to Contact Us..... 10

Effective Date and Changes

This Privacy Policy is effective on the date as shown at the top of is page. We may update this Policy from time to time by posting the new version on our Sites or by providing a notice to you. Your continued use of the Sites after any modifications will constitute your acknowledgement of the modified Privacy Policy. Please check this Privacy Policy periodically for updates.

What is In Scope for this Privacy Policy

This Privacy Policy covers all WENO services and sites we operate where this Privacy Policy is posted (“Sites”) from those located in the United States, United States Territories, and the European Economic Area, United Kingdom, and Switzerland during the time of data collection.

As such, we may ask you to identify which country you are 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 Policy to any person that masks or otherwise obfuscates their location information so as not to appear located in the areas this policy is in scope for.

What is Not in Scope for this Privacy Policy

The following is not in scope of this Privacy Policy

1. ***Personal Health Information.*** 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”), of their business clients, and personal health information processed by us as a part of a WENO service, it is out of scope for this Privacy Policy.
2. ***Job Applicants and Staff.*** Unless otherwise provided for by resident specific privacy rights, the personal information of our job applicants or staff is out of scope for this Privacy Policy. Refer to our workforce privacy policy for this information.
3. ***Children.*** WENO’s services and sites are for adults and legal business entities. WENO does not market to, nor do we intend to offer any service to children or of legal age. WENO does not knowingly collect personal identifiable information from children that are under the age of thirteen or that are not of legal age to use the Sites. If you believe we have inadvertently collected personal data of a child, please contact us by using the information provided in the Contact Section of this policy.
4. ***External Links.*** Our Sites may contain links to external sites or to other online services that we do not operate or control. These may be embedded in some third-party advertisement or sponsor’s information posted. We are not responsible for the privacy practices or data collection policies of these third-party external links. You should review their privacy statements prior to providing any information.
5. ***Without Consent.*** This policy is out of scope if you provide personal information to us on behalf of another person or entity without the legal authority or consent to do so.

Categories of Personal Information WENO Collects, Discloses, or Sales To

WENO may collect your personal information on the following categories as listed below which will vary according to the Sites you use or your device and account settings.

Not all categories of personal information will be collected or received about every individual.

Each category will indicate if the information could be sold and to which type of third party.

Who we disclose to and why

Unless, otherwise mentioned below, all categories may have the information shared with the following types of third parties:

- 1) Service providers, professional consultants, vendors as needed to complete your transactions. These need information to perform their function as it relates to the services we offer. For example: data centers, credit card processors, IT support, help desk, etc.
- 2) Law enforcement, government, agencies for other recipients' legal, security, or safety reasons, and other entities by your consent. These will need personal information shared to enforce legal matters, or investigate security or safety issues, or to maintain security of our services.

Categories of Personal Information Collected

- *Personal Identifiers*, such as name, email, physical or mailing address, telephone or fax number, your business contact information, and social media accounts (if shared with us).
 - *May be sold for targeting advertising purposes: advertising networks, social media platforms, promotional partners, cookie and tracking technologies.*
- *Device or Online Identifiers* such as IP address, Mac address, cookie IDs, your devices operating system or model, and mobile network information.
 - *May be sold for targeting advertising purposes: advertising networks, social media platforms, promotional partners, cookie and tracking technologies.*
- *Internet and Other Network Activity/Transactions and Service Information*, such as information about your interaction on our Sites or online services, or advertisements posted, or keystroke patterns to see if it is you or a bot interacting, and browsing or search activities.
 - *May be sold for targeting advertising purposes: advertising networks, social media platforms, promotional partners, cookie and tracking technologies.*
- *Professional or employment related information* such as job title, organization, professional licenses, credentials, and affiliations.
 - *May be sold for targeting advertising purposes: advertising networks, social media platforms, promotional partners, cookie and tracking technologies.*
- *Audio, electronic, visual, or other sensory information*, such as photographs taken at in person events, and call or meeting recordings.

- *Not sold to any third party*
- *Demographics* such as language preferences, age, gender, or date of birth.
 - *Not sold to any third party*
- *Geolocation data* about the location of your device which may not be precise unless you provide the device's IP address.
 - *May be sold for targeting advertising purposes: advertising networks, social media platforms, promotional partners, cookie and tracking technologies.*
- *Background Information* such as criminal and background checks.
 - *Not sold to any third party*
- *Inferences* such as preferences and characteristics drawn from behaviors, intelligence, and aptitudes.
 - *May be sold for targeting advertising purposes: advertising networks, social media platforms, promotional partners, cookie and tracking technologies.*
- *Financial information* such as partial credit or debit numbers and financial account holders.
 - *Not sold to any third party*
- *Commercial information* such as reviews, travel and vacation information, purchase or transaction history surrounding buying a product or service.
 - *Not sold to any third party*
- *Communication details* such as contents of email, text or other communications, call logs and calendar information when WENO is a party to the exchange.
 - *Not sold to any third party*
- *Information not listed above & related to protected characteristics*
 - *Not sold to any third party*
- *Sensitive information*, such as account login or signatures
 - *Not sold to any third party*

Sources We Collect Personal Information From

We collect personal information described in the above categories from the following sources:

1. Directly from you when you interact with us through our offerings and when you visit our Sites and/or mobile applications, or by voluntary submission through an in person encounter (webinar, conference, etc.).
2. Publicly available information.
3. Other resources to verify or improve the accuracy of our information. As one example: verifies addresses to correct an address to meet standard addresses. Verify professional status, and so on.

Use of Cookies & Tracking Technologies

WENO and our authorized third parties may use the following tracking technologies:

Cookies: 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. Some cookies are necessary for the website to function properly, while others help us understand how visitors interact with our site. We use the following types of cookies:

- **Essential Cookies:** These are necessary for the basic functionality of the website, such as page navigation and access to secure areas. Without these cookies, the website cannot function properly.
- **Analytics Cookies:** These help us understand how visitors engage with the site by collecting anonymous information about page visits, traffic sources, and usage patterns.
- **Functional Cookies:** These remember your preferences and choices, such as language settings, to provide a more personalized experience.
- **Advertising Cookies:** Some of WENO's Services may deliver advertisements and use Advertising Cookies that make the advertisements more relevant to you or your interest and help us measure the effectiveness of advertising campaigns. If you are on a service that delivers advertisements on the site, you may opt out by upgrading your service level.

Our website provides a way to opt out of non-essential cookies.

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, manage your account, 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, for our internal business purposes, research and development, and to 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.

How Long We Retain Personal Information

WENO retains personal information for as long as needed to be in compliance with our data retention schedules or comply with applicable laws or contractual obligations. We may also retain in anticipation of a legal issue or as otherwise necessary to provide you with our services.

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.

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 account may also allow you to access, edit certain information, and manage your preferences from your own settings. You can always use the information in the Contact section of this Privacy Policy to inquire further.

Region Specific Privacy Rights

The following region-specific rights are mentioned if they are not already addressed in this Privacy Policy.

Residents of Designated Countries

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 mask 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 regarding 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 way 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 in the “How to Contact Us” section of this Privacy Policy, 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.

Per the General Data Protection Regulation (EU) 2016/679, if you are a data subject, you may contact us 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.

California Residents

California residents, under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the “CCPA”), may have certain rights regarding your personal data. These rights are summarized below and are each subject to certain restrictions.

1. The right to know (request disclosure of) personal information collected by the us, from whom it was collected, why it was collected, and, if sold, to whom;
2. The right to delete personal information collected from you;
3. The right to opt out of the sale of personal information (if applicable) as more fully described by the California Shine the Light Law.
4. The right to nondiscriminatory treatment for exercising any rights; and
5. The right to initiate a private cause of action for data breaches.
6. The right to correct inaccurate personal information.
7. The right to limit use and disclosure of sensitive personal information.
8. The right to request CCPA reporting metrics for WENO in the past calendar year.

Colorado Residents

Under the Colorado Privacy Act (“CPA”) Colorado residents have the right to receive certain disclosures regarding the processing of their personal data as defined by CPA as well as other rights we honor.

Colorado residents have rights to know, access, portability, and to delete their personal information. They also have the right to opt out of targeting advertisements or sale or profiling. See the “How to Contact Us” section in this Privacy Policy for instructions to know how to exercise these rights.

Denied Appeals

You may contact the Colorado Attorney General to file a complaint related to a denial of your appeal request by phone at 1-720-508-6000.

Connecticut Residents

Under the Connecticut Data Privacy Act (“CTDPA”) Connecticut residents have certain rights regarding how we process their data. WENO honors these rights as defined under CTDPA. Connecticut residents have the right to access, portability, delete, and correct personal information and to opt out of targeting advertisements. See the “How to Contact Us” section in this Privacy Policy for instructions to know how to exercise these rights.

Denied Appeals

You may contact the Connecticut Attorney General to file a complaint related to a denial of your appeal request by phone at 1860-808-5318.

Oregon Residents

Under the Oregon Consumer Privacy Act (“OCPA”) Oregon residents, have rights regarding how their personal information is processed which WENO honors.

Oregon residents have rights to know, access, portability, delete, and correct their personal information. They also have the right to opt out of targeting advertisements. See the “How to Contact Us” section in this Privacy Policy for instructions to know how to exercise these rights.

Denied Appeals

You may contact the Oregon Attorney General to file a complaint related to a denial of your appeal request by phone at 1-503-378-4400.

Texas Residents

Under the Texas Data Privacy and Security Act (“TDPSA”) Texas residents have certain rights for processing their personal data which WENO honors in respect to TDPSA.

Texas residents have rights to know, access, portability, delete, and correct their personal information. They also have the right to opt out of targeting advertisements/sales and profiling. See the “How to Contact Us” section in this Privacy Policy for instructions to know how to exercise these rights.

Denied Appeals

WENO has 60 days from receipt of an appeal to provide you with a decision. You may contact the Texas Attorney General to file a complaint related to a denial of your appeal request by phone at 1-512-463-2100.

Utah Residents

Under the Utah Consumer Privacy Act (“UCPS”), Utah residents have certain rights regarding processing their personal data which WENO honors.

Utah residents have rights to access, portability, and delete their personal information. They also have the right to opt out of targeting advertisements. See the “How to Contact Us” section in this Privacy Policy for instructions to know how to exercise these rights.

Virginia Residents

Under the Virginia Consumer Data Protection Act (“VCDPA”), Virginia residents have certain rights regarding processing their personal data which WENO honors.

Virginia residents have rights to access, portability, delete, and to correct their personal information. They also have the right to opt out of targeted advertisements. See the “How to Contact Us” section in this Privacy Policy for instructions to know how to exercise these rights.

Denied Appeals

WENO will have 60 days from receipt to provide a decision about an appeal per your Virginia Privacy Rights. You may contact the Virginia Attorney General to file a complaint related to a denial of your appeal request by email at mailoag@oag.state.va.us.

Washington Residents

We do not collect any consumer health data that is subject to the Washington My Health Data Act.

How to Contact Us

To exercise your privacy rights or if you have any questions or concerns about this Privacy Policy, please contact our Privacy Officer, Sydney Pauley, at syd@wenoexchange.com and please copy admin@wenoexchange.com.

Opt Out Options

To opt out of advertising on your online account, you should ask your administrator to upgrade your status to be advertisement free. This feature will cost your account owner a higher user fee which may or may not be passed down to you.

If using our website, the cookie banner provides instructions to opt out of sharing information. Your browser cookie setting on the device(s) you use will also provide you with this ability.

You cannot opt out of sharing information you voluntarily provide when the information is required to buy, purchase, or while you are using our services.

We Must Verify Prior to Fulfilling a Request

Before we fulfill a request specifically for access, portability (transmit to another when feasible), delete, or correct personal information, we must verify your identity and if you have the right to make such a request, as there may be exclusions or restrictions associated with your request. If you have a WENO account, you should log into your account & open a support ticket for your request so we can verify you as user. If you do not have a WENO account, we will require you to complete and notarize a formal request document which will include a declaration under penalty of perjury that you are legally authorized make the request and require you to provide name, email, and telephone number at a minimum, depending on the request, we may need more information. Authorized agents may exercise rights on your behalf by submitting a request, but they will be required to demonstrate authority to act on your behalf.

Appeals

If we refuse to fulfill a request for you to exercise your privacy rights, you may appeal the privacy officer's decision by contacting admin@wenoexchange.com. WENO will respond to your appeal request and provide you with a timely decision (45 days in most cases, but within the time allowed for any requestors specific regional privacy laws).