

Privacy Policy

Updated and effective as of July 2024

We are committed to providing privacy to our website users and our products. The following Privacy Policy expands upon how we collect your personal data and how we ensure such data is protected, along with your rights regarding the use of said data. Please ensure you take the time to read this Privacy Policy thoroughly.

The Privacy above Policy applies across our platforms, including our website ("**Website**"), our mobile app "Imagin8" ("**Mobile App**"), and includes our products, offers, features, tools, and resources provided through said platforms (collectively, our "**Online Products**"). The controller of your Personal Data collected via our Online Products according to Art. 4(7) GDPR is WNDR11 LTD, located at Akropoleos, 59 - 61, 3rd floor, Office 301, 2012, Nicosia, Cyprus ("**WNDR11**" or "**we**").

All provisions of this Privacy Policy are drawn up by European legislation in the field of personal data compliance (General Data Protection Regulation (EU GDPR)), as well as have been brought into line with, comply with, and do not contradict the requirements of US legislation in the field of personal data protection (in particular, we have used the provisions of The California Consumer Privacy Act (CCPA)).

WHICH DATA IS COLLECTED?

Information that can be used to identify or contact you is Personal Data. Examples may include your name, address, email address, telephone number, birth date (primarily for eligibility purposes), and billing and credit card information. We collect Personal Data from you when you use our Website or our Online Products, as further described in this Privacy Policy.

When you visit our Online Products, we collect personal data from you. In all such cases, we only handle Personal Data that you directly provide to us or data that is automatically

collected from you as outlined in this Privacy Policy. We will never share your personal data other than specified in this Privacy Policy or unless you give us express permission.

We collect the following personal data:

- your full name
- your valid email
- your photo from a social media (Facebook)
- your Identifier for Advertisers (IDFA)

This data is stored on our secure web servers, provided to us by Amazon Web Services, Inc. under the Service Agreement and Data Processing Agreement.

Refer to the [Privacy Policy and Data Processing](#) of the server.

HOW IS YOUR PERSONAL DATA USED?

In the subsequent section, we will outline exactly how and why your Personal Data is collected. The legal basis for this collection will also be highlighted to the extent that the legal basis of our handling of your data is in our legitimate interests. You can contact us using the contact details below if you require more information on our legitimate interests. If your consent is used as the legal basis of our handling of your Personal Data, you have the right to withdraw your consent at any time with future effect as described in this section or by contacting us using the contact details provided. It will not affect the handling of your Personal Data until the withdrawal. The same applies to your consent or our legitimate interests in other parts of this Privacy Policy.

If You Use Our Online Products:

We gather data; sometimes, it contains Personal Data. When you choose, our Online Products are provided directly to us (available either for free or on a subscription basis), such as our Mobile Application “Imagin8.” We also gather data through surveys, questionnaires, self-assessment quizzes, and contests, which you provide directly. The information obtained is used to tailor your customer experience using our Online Products.

Additionally, we gather data automatically, including Personal Data, when you visit our website or use our Online Products; such information includes your browser type, IP address, error logs, operating system, and other similar data.

This aggregated data cannot be used to identify you and is utilized by us to monitor trends, monitor Online Products use, administer the Online Products, and collect general information about how our Online Products are used.

The legal basis for such processing of your Personal Data is our legitimate interests (Art. 6(1)(f) GDPR) in customizing the content of our services in line with user preferences and in further improving our Online Products.

It is important to note that providing us with your data is not a legal requirement. However, we must provide you with a complete range of Online Products with such information.

If You Become A User

You must first become a user to access some of our Online Products. During this process, you must provide us with personal information such as your name, address, and email address. Additionally, if you become a user of one of our Online Products, your credit/debit card and billing information will be processed. This data is used exclusively for billing and subscription purposes. Handling such information is essential for our services to work for users correctly. Therefore, The legal basis for processing your Personal Data is Art. 6(1)(b) GDPR. Providing demographic information (such as number of children or occupation) is optional. However, providing this information will allow us to tailor our services to you on our Online Products. The legal basis for such processing of your Personal Data is our legitimate interests (Art. 6(1)(f) GDPR) by tailoring our content to user preferences and continually improving our Internet Services.

Sending you Service Updates

Your Personal Data will be used to keep you updated on important service announcements and online product updates. If you subscribe, such updates will also include your billing account status. We will communicate transactional information regarding your subscription or verify login details when you become a user. These updates include important information regarding the use of our Online Products.

To maintain the performance of our products, handling your Personal Data is critical. Therefore, The legal basis for processing your Personal Data is Art. 6(1)(b) GDPR. We cannot provide you with service-related communication without such Personal Data, which you must provide us with.

Contacting our Customer Service

We will respond to your queries and manage services such as subscriptions should you contact our customer service. The communications channel will be according to your preference (telephone, email, etc.). Such processing of your Personal Data is necessary for the performance of our services; the legal basis for such processing of your Personal Data is, therefore, Art. 6(1)(b) GDPR. We cannot provide you with customer service-related communication without providing such Personal Data, which you are obliged to provide us with.

Subscription to Newsletters and other Marketing Communications

You can agree to receive newsletters and additional information on our products and services when subscribing to our Online Products. Social media and email will send you promotional newsletters and information regarding events and surveys if you choose to “opt in.” The legal basis for such processing of your data is your consent (Art. 6(1)(a) GDPR) or – if you are a user – our legitimate interest (Art. 6(1)(f) GDPR) in providing you with relevant marketing information.

Without your Personal Data, we cannot inform you of our products and services. However, please note that you are not legally required to provide your Personal Data. At any time of

your choosing, you can opt out of receiving such communication by following the steps regarding handling such information.

Using our Social Features

Features such as message and bulletin boards, recipe swaps, and other similar activities where users can communicate with each other can be found on our Online Products. A “Public Profile” feature is also offered. It allows you to share information about yourself, including Personal Data, within the “Social Features” section of our Online Products. In utilizing this feature, you should know that we have no control over how others might use your personal data. It includes receiving unsolicited messages from other users. You can contact us using the contact details below if you wish for specific content you generated to be removed. Any Personal Data posted via the Social Features are processed to provide you with the respective service, and the legal basis is Art. 6(1)(b) GDPR. Unfortunately, you cannot use the Social Features function without providing your Personal data, even though you are not legally required to provide us with said information.

SOCIAL PLUG-INS AND OTHER THIRD-PARTY FEATURES

Our Online Products may contain links to or features of third-party websites. Third-party websites and features are not covered in this privacy policy and, as such, only cover the practices regarding the privacy policy of **WNDR11**. We are not responsible for third-party websites' privacy policies and practices. You should always endeavor to read the privacy policy of third-party websites when linking to them.

To the extent certain third-party website features are available on our Online Products, the following terms apply:

We use plug-ins of several social networks, Facebook, Twitter, Instagram, TikTok, etc., to allow our Online Product users to share content found on our Online Products easily and connect with their friends via such social networks.

Your device establishes a direct connection to the servers operated by the provider of the social network whenever you view a page of our Online Products containing such a plug-in.

It means the network provider transfers the social plug-in's content directly to your device and is embedded in our Online Products being shown. When you visit our online products while logged into your social network, your visit will be sent to the network provider. Then, the social network provider can match your visit to our site with your social media account. It is essential to know that a data transfer starts when you visit our Online Products, whether or not you interact with the plug-in. To avoid this, you must log out of your social network account before visiting our Online Products. To be aware of the privacy policies of Facebook, Twitter, Instagram, TikTok, etc., please refer to such websites' respective privacy policies, data collection, and analysis. It will allow you to modify your settings to protect your privacy. The option to connect your **Imagin8** account with third-party applications or devices, such as a tracker, is offered by our Online Products. A tracker is a device that tracks or measures the user's activity. E.g., number of steps and distance covered, calories burned during a specific activity, and other metrics. Should you use such applications or tracers by connecting your **Imagin8** account, the third-party provider will receive the information from us that you have a **Imagin8** account.

The Data collected by any third-party tracker will be transferred to us and may be added to your **Imagin8** account. Such data will be subject to the terms of this privacy policy. In our Online Products, you can disconnect the trackers from your **Imagin8** account. Please refer to the privacy policy of your Tracker provider for further details, which may include information on what your third-party Tracker and account collects specific data on.

HOW WE SHARE AND DISCLOSE PERSONAL DATA

Unless the law requires, we will not sell, share, transfer, or otherwise distribute your Personal Data to third parties. Unless required by law according to Art. 6(1)(c) GDPR, unless required for your contract according to Art. 6(1)(b) GDPR, unless the third party acts as a data processor on our behalf according to Art. 28 GDPR or you have given us express consent to do so according to Art. 6(1)(a) GDPR.

Some of your Personal Data is collected and shared by the following companies:

- **Amplitude, Inc.** ([link to Privacy Policy](#)),

- **Firestore by Google LLC** ([link to Privacy Policy](#)),
- **Facebook Inc.** ([link to Privacy Policy](#)),
- **Adjust** ([link to Privacy Policy](#)).

To provide external analytical services.

Such data is collected through the Software Development Kit (SDK) built into our products.

We do not gain access to such data or store it on our servers. The above companies assume full responsibility for storing and processing such data.

To exercise your legal rights by the GDPR, you can make a request both directly to these companies and us. Rest assured, we will forward your request on time!

To facilitate or offer our services, we also use third-party service providers, and as such, we share your Personal Data with them to allow them to perform their service on our behalf. For example, we use a mailing company to distribute marketing messages via email, payment service providers for specialist providers for payment collection and fraud screening, to bill you for goods and services, a shipping company to fulfill orders, social media, and other agencies to manage our social media and other advertising campaigns, a cloud provider for our CRM system and an external provider for the hosting of our e-shop. A call center provider to facilitate customer service

Some companies described above are outside the European Economic Area, where we share your Personal Data.

To maintain sufficient protection of your Personal Data in this context, we use standard data protection clauses adopted by the European Commission according to Art. 46(2)(c) GDPR with such companies or certifications of such companies according to Art. 45(1) GDPR. You can request further details by contacting us at the contact details below.

The sharing of Personal Data with other **WDR11** entities or service providers. It will be done by the applicable and relevant laws on data protection and are limited to the extent necessary. These companies have been selected carefully, and we regularly monitor their compliance with our instructions. Contractually, these companies are prohibited from using your personal data for purposes other than this privacy policy. The legal basis for our sharing of your Personal Data with such companies is Art. 28(1) GDPR or our legitimate interests in

commissioning those companies with the services described above (Art. 6(1)(f) GDPR).

There may be a time in response to a lawful request by a public authority or when we must comply with a legal obligation to disclose your Personal Data to government or law enforcement officials. Including the need to meet law enforcement national security requirements according to Art. 6(1)(c) GDPR.

To respond to any claims, protect our rights or the rights of a third party, ensure the safety of any person in preventing any illegal activity, or pursue our legitimate interest in applying or enforcing our terms and conditions, we can also disclose your information. (including for fraud protection and credit risk reduction) according to Art. 6(1)(f) GDPR.

We will obtain your consent before sharing your Personal Data with other companies if required under applicable data protection laws. In such instances, the legal basis is Art. 6(1)(a) GDPR.

IS MY PERSONAL DATA USED FOR ANY OTHER PURPOSES?

Your Data will only be used for the purposes in this Privacy Policy or otherwise explicitly disclosed when requesting such Personal Data. We will provide you with the relevant information about using your Personal Data if handled outside of the scope of this Privacy Policy.

YOU HAVE THE FOLLOWING RIGHTS:

- Right of access (Art. 15 GDPR):

You have the right to request confirmation as to whether we handle your Personal Data and, where that is the case, to request access to the Personal Data we have about you.

- Right to rectification (Art. 16 GDPR):

You have the right to request the correction of incorrect Personal Data.

- Right to erasure (Art. 17 GDPR):

You have the right to request the erasure of Personal Data without undue delay under certain circumstances, e.g., if your Personal Data is no longer necessary for the purposes for

which it was collected or if you withdraw consent on which our processing is based according to Art. 6(1)(a) GDPR and where there is no other legal ground for processing.

- Right to restriction of processing (Art. 18 GDPR):

You have the right to request us to restrict the handling of your Personal Data under certain circumstances, e.g., if you think that the Personal Data we handle about you is unlawful or incorrect.

- Right to data portability (Art. 20 GDPR):

You have the right to receive the Personal Data you have provided us with in a structured, commonly used, and machine-readable format, and you have the right to transmit that information to another controller without hindrance or ask us to do so under certain circumstances.

- Right to object (Art. 21 GDPR):

You have the right to object to the handling of your Personal Data under certain circumstances, in particular, if we process your Personal Data on the legal basis of legitimate interests (Art. 6(1)(f) GDPR) or if we use your Personal Data for marketing purposes.

You can execute your rights above by contacting us at the contact details below.

RIGHT TO LODGE A COMPLAINT BEFORE THE DATA PROTECTION AUTHORITY

You have the right to complain with a supervisory authority, particularly in the EU Member State, of your habitual residence, place of work, or place of the alleged infringement if you consider that our processing of your Personal Data infringes the applicable data protection laws.

DATA RETENTION

Your Personal Data is stored along with other information for as long as it is needed to ensure you can use our Online Products to comply with relevant laws (including those regarding document retention) and provide services to you. Your Personal Data is also stored to resolve any disputes that may arise with any parties and which are otherwise

deemed necessary for us to conduct our business. Please contact us at the contact details listed below if you have any questions regarding the specific retention times for certain types of Personal Data.

AUTOMATED INDIVIDUAL DECISION-MAKING

Based on the automated processing of your Personal Data. We do not use your Personal Data to make decisions with legal or similar effects for you.

UPDATES TO THIS PRIVACY POLICY

This privacy policy may be amended occasionally. Any such changes will be made available through updates. Please refer back to this privacy policy regularly.

WHO DO I CONTACT IF I HAVE ANY PRIVACY QUESTIONS?

If you have any concerns, queries or questions regarding our Privacy Policy please contact us at support@wndr11.cy.