

Privacy policy – Mediterranean Wellness, LLC

Summary language: Mediterranean Wellness, LLC is committed to protecting and respecting your privacy. In general, we use the information you provide, including any medical or health information, in connection with our provision of services to you and in our research into new services.

We do not share this information with anyone, including your employer or other sponsors of these services, except on an aggregated, summary basis that will not identify you or any other specific person.

We do not share this data with any third parties for their marketing purposes. Your privacy is protected from such third party marketing by default.

Full information about the information we collect and the uses we make of it, including important information about the international transfer of your personal data to the United States, is set out below in the full policy.

Consent Language:

Please confirm that you have read our full privacy policy and consent to the treatment of the personal data (including sensitive data) as it describes by checking the I Accept box.

Your consent is voluntary, although we may not be able to communicate with you effectively or provide you with certain services unless you provide us with the requested information and authorize its use.

Full Policy: This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

For the purpose of certain European Union privacy rules (particularly EU Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data), the data controller for this information is Mediterranean Wellness, LLC, established in Pittsburgh, Pennsylvania, United States. The information you provide will thus be transmitted to and stored in the United States, which the European Commission has deemed not to provide an adequate level of privacy protection.

The person responsible for our compliance with this policy, and our nominated representative for the compliance purposes is Dr. Will Clower. If you have any questions or concerns about your person information, please contact us at info@willclower.com.

By agreeing to this policy, you authorize your personal data to be provided to Mediterranean Wellness, stored, and otherwise processed in the United States consistent with this privacy policy.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website www.willclower.com (our site). This includes information provided at the time of registering to use our site, subscribing to our services, posting material or requesting further services. We may also ask you for information when you report a problem with our site.
- Information that your employer provides in order to contact you so that we may offer the services to you.
- If you contact us, we may keep a record of that communication.
- We will also ask you to complete surveys that we use to assist you and for research purposes, although these are optional and you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfillment of your tasks within the program.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

"Personal data", as we use it in this policy, means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. This may include sensitive personal data such as the processing of personal data revealing racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, and the processing of data concerning health or sex life.

IP ADDRESSES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

COOKIES

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve

our site. We do not use technologies that monitor your interactions with other websites. You may set your browser to block cookies, and we will respect your expression of that preference.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), in the United States. It may also be processed by staff operating outside the EEA who work for us in the United States. Such staff may be engaged in, among other things, support of our programs and research, the fulfillment of orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take steps to ensure that your data is reasonably securely and treated in accordance with this privacy policy.

All information you provide to us is stored on our servers in the United States. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we take reasonable steps to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

USES MADE OF THE INFORMATION

We will use your medical and health information in connection with our provision of services to you, such as in providing suggestions and fulfilling requests. We also use data to improve our services, design new services, and for other research purposes.

We never use the information obtained for marketing purposes, nor do we provide, sell, or trade in the data or information provided to us through any of our programming.

We do not share this identified information with anyone, including your employer or other sponsor of these services, except on an aggregated, summary basis that will not identify any specific person.

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes, but not for any marketing purposes. There is no “up-selling” to program participants.
- To carry out our obligations arising from any contracts entered into between you and us.

- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

We never use the information obtained for marketing purposes, nor do we provide, sell, or trade in the data or information provided to us through any of our programming.

Although we do not disclose information about identifiable individuals, we may use your data to create representations of aggregate information about our users. This representation of the aggregate information is for educational purposes, or to exemplify the generic outcomes that have been obtained through participation in this program when explaining this program to employers and other business customers.

DISCLOSURE OF YOUR INFORMATION

In the future, we may disclose your personal information to any of our subsidiaries, our ultimate holding company and its subsidiaries, or other members of our corporate group.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Mediterranean Wellness, LLC or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Mediterranean Wellness, LLC, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

YOUR RIGHTS

We never use the emails obtained for marketing purposes, nor do we provide, sell, or trade in the data or information provided to us through any of our programming.

You have a right to request (i) whether personal information about you is being processed, (ii) communication of the data being processed in an intelligible form, (iii) information about the way the data is being processed, and (iv) information of your rights to appeal the processing of your data. You also have the right to request that your personal information is corrected, where incomplete or inaccurate, and in certain circumstances to have your personal data blocked or deleted.

We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at Mediterranean Wellness, LLC, 2020 Ardmore Blvd, Suite 211, Pittsburgh, PA 15221, USA or at info@willclower.com.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 entitles California customers to request information concerning whether a business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. As stated in this Privacy Policy, we will not sell or share your Personal Information with other companies for their direct marketing purposes without your consent. Customers who wish to request further information about our compliance with this law or have questions or concerns about our privacy practices and policies may contact us at Mediterranean Wellness, LLC, 2020 Ardmore Blvd, Suite 211, Pittsburgh, PA 15221, USA or at info@willclower.com.

OTHER SITES

Our site may, from time to time, contain links to and from the websites of our partner networks, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, if appropriate, we may notify you by e-mail or other means. We will not retroactively change this policy in a material way without seeking your consent, although we may change this policy materially prospectively, that is, the material changes will apply only to the data collected under the new policy unless we have your consent.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to at Mediterranean Wellness, LLC, 2020 Ardmore Blvd, Suite 211, Pittsburgh, PA 15221, USA or at info@willclower.com.