

## **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.

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. Mediterranean Wellness, LLC is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC). 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. 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 on a secure server within the United States.

### **EU-US PRIVACY SHIELD FRAMEWORK**

Mediterranean Wellness, LLC complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries.

Mediterranean Wellness, LLC has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

### **US-SWISS SAFE HARBOR FRAMEWORK**

Mediterranean Wellness, LLC complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. Mediterranean Wellness, LLC has certified that it adheres to the Safe Harbor Privacy Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access, and Enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the

US-Swiss Safe Harbor and to view our certification page, please visit <http://www.export.gov/safeharbor/>

## **INFORMATION WE MAY COLLECT**

We may collect and process the following data:

- Information that provided by filling in forms on our website [www.willclower.com](http://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 as an eligibility file in order for us to contact you so that we may offer the services to you.
- Biometrics information, such as height, weight, blood pressure, cholesterol, triglycerides, glucose. This information will either be supplied by each user inputting their own data, or by an upload of data from a company sponsored screening event.
- 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 in your personal health goals, and to assist us in our efforts to provide a more effective and efficient platform. These surveys are optional and you do not have to respond to them.
- The 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.

## **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 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.
- To carry out our obligations arising from any contracts entered into between you and us, as well as your employer 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.

## 1. Notice

Mediterranean Wellness shall inform individuals of the purpose for which it collects and uses the personal information and the types of non-agent third parties, if any, to which Mediterranean Wellness discloses or may disclose that information.

Mediterranean Wellness shall provide the individual with the choice and means for limiting the use and disclosure of their personal information. Notice will be provided in clean and conspicuous language when individuals are first asked to provide personal information to Mediterranean Wellness or as soon as practicable thereafter, and in any event before Mediterranean Wellness uses or discloses the information for a purpose other than for which it was originally collected.

## 2. Choice

Mediterranean Wellness collects information from participants upon registration. This information is collected in order for Mediterranean Wellness to create a profile for an individual. At no time, will this information be shared with third parties. If there is a time where Mediterranean Wellness needs to share this information, they will notify the individual with the reason and purpose before information is shared.

In some cases, Mediterranean Wellness may receive information regarding participants from employers. Mediterranean Wellness uses this information to create log in credentials. At no time will this information be shared with third parties.

If our practice regarding data sharing should change in the future, Mediterranean Wellness will update this policy and provide opt-out choice to individuals prior to sharing their data with non-agent third parties

### 3. Transfers to Third Parties

If Mediterranean Wellness ever transfers personal data from the EU to a third party, we will enter into a written agreement with such third party requiring that they provide at least the same level of privacy protection as is required by the Privacy Shield.

Mediterranean Wellness LLC may be liable in cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield.

### 4. Access

We acknowledge the right of individual's to access their personal data. Upon request, individuals may have access to personal information about them that is held by Mediterranean Wellness in order to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated. These requests can be made through our administrator desk by email [info@willclower.com](mailto:info@willclower.com) or phone 800-<https://plus.google.com/u/0/106421622715270000167/about977-6337>.

### 5. Security

Mediterranean Wellness will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Note that Mediterranean Wellness may be required to release personal data in response to lawful requests by public authorities, including to meet national security and/or law enforcement requirements.

### 6. Data integrity

Mediterranean Wellness will only use personal information for the purposes for which it is was collected. Mediterranean Wellness will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

## 7. Enforcement

### EU-US Privacy Shield

In compliance with the EU-US Privacy Shield Principles, Mediterranean Wellness, LLC commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Mediterranean Wellness at the address at the end of this policy.

Mediterranean Wellness, LLC has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to BBB EU Privacy Shield, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

### US-Swiss Safe Harbor

In compliance with the US-Swiss Safe Harbor Principles, Mediterranean Wellness, LLC commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss individuals with inquiries or complaints requiring this privacy policy should first contact Mediterranean Wellness at the address at the end of this policy.

Mediterranean Wellness, LLC has further committed to refer unresolved privacy complaints under the US-Swiss Safe Harbor to an independent dispute resolution mechanism operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information and to file a complaint.

## **CONTACT**

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